

# Privacy Policy

## Background

This privacy policy of Natacha Sommer Carvalho ("Coach") explains how the Coach processes personal data within the scope of its business activities and your rights in relation to personal data.

The Coach protects the confidentiality and security of the personal data that the Coach collects and processes. The Coach processes data in accordance with the Swiss Data Protection Act ("DSG") and, where applicable, the European General Data Protection Regulation ("GDPR").

Please read this privacy policy carefully. Your acceptance of the privacy policy is deemed to occur upon your first use of the website of the Coach at [www.natacha-sommer.com](http://www.natacha-sommer.com) and/or any sub-domains ("Website"). If you do not accept and agree with this privacy policy, you must stop using our Website immediately.

If you provide the Coach with personal data of other persons, please make sure that you are allowed to share this personal data and that this personal data is correct.

## 1. Controller and responsibility

Responsible for the processing of personal data and thereby the controller, in accordance with this privacy policy is the Coach (Telephone +41 79 453 79 20, Email [contact@natacha-sommer.com](mailto:contact@natacha-sommer.com)).

## 2. Definitions

*Personal data* is all information relating to a specific or identifiable (i.e. identified or identifiable) person, such as name, mailing address, telephone number, e-mail address, date of birth, etc.

*Processing* means any operation with personal data, irrespective of the means applied and the procedure, and in particular the collection, storage, use, revision, disclosure, archiving or destruction of data.

## 3 Visiting our Website

During your visit on the Website, general information is automatically recorded (e.g. date of your visit, type of web browser, your IP address, the operating system used and the domain name of your internet service provider). The Coach uses this data for administration purposes and to ensure the functionality of the Website. This data is required in order to correctly deliver and optimize the contents of the Website, to guarantee the long-term operability of our IT systems and of the Website and to provide law enforcement authorities with the information they need for criminal prosecution in the event of a cyber attack. However, none of this information allows the Coach to draw any conclusions about your personal identity.

## Cookies

Cookies are small text files which are automatically stored on the hard drive of your computer when visiting the Website. They do neither cause any damage nor transmit personal data.

You can change your browser settings to block cookies, only save cookies for one session or otherwise delete them prematurely. Most browsers are preset to accept cookies. However, you can prevent cookies from being saved on your computer's hard drive by changing your browser settings. Please refer to your browser manufacturer's instructions to find out in detail how this is done. In addition, you can delete cookies already set on your hard disk at any time. Please note that if you decide to disable cookies, certain functions may no longer work.

## Types of Cookies

### *Mandatory and non mandatory cookies*

Mandatory cookies are information sent to the browser on your computer's hard drive allowing the Coach to offer you certain functions. They do not require the consent of the users of the Website. Non mandatory cookies enhance the user-friendliness of the Website. The Coach uses the following mandatory, temporary cookies: web-server, storage of user data during a session, duration of a session.

### *Temporary cookies*

Temporary cookies store information that is used by you as a visitor during your current browser session. You are assigned a session-ID so that you can navigate between the different pages of the Website of the Coach without interruption. Based on the session ID, it is not possible to identify you as a person. These cookies do not leave any retrievable information on the hard drive of your computer. Once the browser is closed, these cookies are automatically deleted.

### *Permanent cookies*

Permanent cookies store information between two visits of the Website. Due to these cookies, visitor patterns can be recognized over a longer period of time and evaluated on a regular basis. Depending on their function, these cookies are stored on the hard drive of a computer between few minutes up to several years. With these cookies, you can, for example, access information on the Website that is specifically tailored to your interests. The Coach itself does not use permanent cookies. Cookies from third parties remain reserved (see below).

### *Third party cookies*

The Coach also cooperates with Google Analytics, a web analytics service provided by Google LLC (USA) and Google Ireland Limited (Ireland), especially in the fields of web analysis and advertising. Google Analytics also uses cookies. By saving data in its cookies, Google Analytics can determine which pages were viewed by users in order to display appropriate advertisements. The cookies from Google Analytics do not save any personal data. The Coach uses the following cookies of Google Analytics:

Google Analytics `_gat`, Throttle the request rate, ten minutes;

Google Analytics `_ga`, Distinguish unique users, two years.

Further information on Google Analytics and data protection can be found by clicking on the following link: <https://support.google.com/analytics/answer/6004245?hl=en>.

## **4. Coaching**

The Coach processes the personal data disclosed by you to the Coach for performing the coaching service as described in the general Terms and Conditions of the Coach and other agreements entered between you and the Coach ("Coaching").

With your voluntary disclosure to the Coach, you expressly consent to the processing of such personal data. Your data will be processed for the purpose of the Coaching and to fulfill legal obligations only.

## **5. Events and mailings**

The Coach processes the following personal data with regard to our events and mailings: first name, surname, home address, telephone number and e-mail address. Optionally, for events and mailings, you can also provide us with information on salutation and additional information, academic titles, company and telephone numbers. The Coach uses this personal data for marketing purposes (using any means of communication such as e-mail, social media, post, fax or telephone) to inform you about programs, publications, events, news, services, products,

projects, coaching and/or related information of the Coach or third parties that may be of interest to you.

## **6. Credentials of ICF**

The Coach engages in training and continuing education pursuing and/or maintaining credentials of the International Coach Federation, 2365 Harrodsburg Rd, Suite A325, Lexington, KY 40504, USA (the "ICF"). That process requires the processing of first name, surname, home address, telephone number and e-mail address of you for possible verification by ICF. Such personal data as well as start and end dates of your Coaching will be shared with ICF staff members and/or other parties working for ICF for the sole purpose of verifying the coaching relationship by ICF; no personal notes will be shared. Please be aware that ICF is located in a jurisdiction (USA) that does not provide for an adequate level of protection according to the GDPR (no adequacy decision pursuant to Article 45(3) GDPR), that the ICF has not joined the EU-U.S. or the Swiss-U.S. Privacy Shield Frameworks and that no appropriate safeguards pursuant to Article 46 GDPR, which include binding corporate rules and standard data protection clauses, have been put in place with respect of the relationship to the ICF.

## **7. Storage**

To the extent required by applicable data protection laws, your personal data will be deleted with respect to the purpose of processing for which they were collected as soon as they are not required anymore to meet such purpose of processing. The storage of your personal data in accordance with the legal storage and documentation obligations remains reserved.

## **8. Basis for processing your personal data**

If required by applicable data protection laws, we request your consent for the processing of your personal data. The consent then constitutes the legal basis for the processing. Furthermore, the legal basis for the processing - depending on the circumstances and the applicable data protection laws - may also lie in the fulfillment of the contract, the implementation of contractual measures or the safeguarding of legitimate interests. Legitimate interests are in particular direct advertising or direct marketing and the safeguarding of network and information security.

## **9. Your rights**

You can revoke/withdraw your consent at any time without affecting the lawfulness of the processing carried out on the basis of the consent given until the revocation/withdrawal. In addition, you have - depending on the circumstances and applicable data protection laws - in particular the right to access free of charge and to correction of your stored personal data. According to individual foreign data protection laws - insofar as they apply - you may be entitled to further rights such as the right to disclosure of or access to your personal data concerned, the right to correction, deletion or restriction of the processing of personal data, the right to object to processing, the right to appeal to a competent supervisory authority and the right to data transmission/portability.

These rights do not apply to personal data that we may or must process for you within the scope of a client activity or that we may or must store for legal reasons.

Concerning revocation, exercise of your other data protection rights as well as further questions, suggestions and comments on the subject of data protection, please contact the Coach using the contact details given above or by e-mail at [contact@natacha-sommer.com](mailto:contact@natacha-sommer.com).

## **10. Data transfers to third parties and abroad**

The Coach will not pass on your personal data to third parties unless

- it is expressly stated otherwise in this privacy policy;
- it is necessary to protect your interests;
- it is necessary to maintain or uphold your business relationship with the Coach; or

- you have given your prior consent.

The Coach will appoint and is appointing processors to host, maintain, manage and store (e.g. backup and/or cloud storage) your personal data which will process personal data to the extent necessary to fulfill such hosting, maintenance, managerial, backup, and/or related purposes. In this respect, some of your personal data may be stored outside of Switzerland and the European Union. If the Coach does store data outside Switzerland or the European Union for the purposes stipulated above, the Coach will take all reasonable steps required by applicable data protection laws to ensure that your personal data is treated as safely and securely as it would be if it was processed in Switzerland or within the European Union.

### **11. Security and liability**

The Coach protects personal data against loss, misuse, unauthorized access, disclosure, modification or destruction by taking appropriate measures. For this purpose, the Coach uses appropriate technical and organizational security measures, which are continuously improved in line with technological developments. However, the Coach cannot guarantee the absolute security of the data it processes. The Coach assumes no liability for violations of this privacy policy, unless they are intentional or grossly negligent.

### **12. Final provisions**

The Coach reserves the right to amend the content of this privacy policy at any time without prior notification. Thus, it is recommended that this privacy policy is consulted on a regular basis.

If any one or more sections or parts of a section of this privacy policy shall be found to be illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired thereby. The invalid, illegal or unenforceable provision(s) shall be replaced by valid provisions which best correspond to the economic purpose of the invalid provisions.

Subject to potential mandatory applicable data protection laws, this privacy policy shall be governed by, and construed and enforced in accordance with, the laws of Switzerland, excluding its conflicts of law provisions. Subject to potential (additional) foreign places of jurisdiction which apply by mandatory foreign law, the exclusive place of jurisdiction shall be Zurich 1, Switzerland.

Natacha Sommer Carvalho

Status: Valid as of 21.November. 2019