

# Privacy Policy.

## 1. Who we are

We are Anna Kotskaya, registered in BIR district #50, Makati, Philippines with

- TIN Number 501-133-393-000 under Line of Business 7414 (Business and Management Consultancy Activities) .

## 2. What is Personal Information?

Personal information is any information which we collect about you that can be used to identify you and is stored electronically.

Personal information will include any information, such as your name, address, IP address, that is collected about you by us for any reason, whether it be in connection with visiting our website or by contacting us.

It also includes any personal information that we may collect about you that is in the public domain, such as information made public on social media that is available to us when you connect with us on social media.

It is our intention to provide you with as much information as possible about what we do with that personal information, so that when you provide the personal information to us, you do so with an awareness of how it will be used.

## 3. How we collect your personal information and why

We will need to collect personal information about you, and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal information:

- (a) from visitors to our website.
- (b) through social media;
- (c) anyone referred to us from enquiries made of our partners (via their websites or otherwise);
- (d) anyone who contacts us;
- (e) anyone who uses our service;
- (f) anyone who subscribes to our marketing.

## **3.2 Visitors to our websites**

Our website is managed by us with support of the 3rd party Electronbox / PC Doctor. As part of the service provided by Electronbox, they will help to maintain the security and the performance of our website by (i) encrypting data in transit and protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors using third party tools and (iv) providing secure hosting services through their servers.

Electronbox's privacy notice can be found at [www.electronbox.net](http://www.electronbox.net)

### **3.2.1 Cookies**

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our website for our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our website, which allows us to provide you a better experience and also allows us to improve our website.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our website that you will be unable to access or that will not function properly.

### **3.2.2 Third party services**

Whenever you visit our website, we will use a third party service, Google Analytics, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is that it is within our legitimate interests to find out how many people visit the website and the various parts of the website, it improves the service provided to you and improves customer experience. This information helps us to find out how our website is working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our website.

## **3.3 Social media**

Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network. Our website contains links to our social media pages. We currently use:

3.3.1 Facebook, which has its own privacy notice that can be located at <https://www.facebook.com/privacy/explanation>;

3.3.2 LinkedIn, which has its own privacy notice that can be located at <https://www.linkedin.com/legal/privacy-policy?trk=uno-reg-guest-home-privacy-policy>;

3.3.3 Instagram, which has its own privacy notice that can be located at [https://help.instagram.com/519522125107875?helpref=page\\_content](https://help.instagram.com/519522125107875?helpref=page_content)

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal information.

### **3.4 Contacting us**

Our website provides you with different ways to contact us.

3.4.1 You can Contact us using the Contact page. All communications are handled, reviewed and responded to internally by us. Please note, however, that email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

3.4.2 You can use Calendly service to schedule an online meeting with us. Calendly collects the following appointment information from Calendly Users: names, email addresses, the subject of the meeting; and any other information provided as required upon scheduling, pursuant to the Calendly Terms of Use. If you do not wish to become a Calendly User, please contact us using the Contact page or through other means to set up your meeting with us.

Calendly has its own privacy notice that can be located at <https://calendly.com/pages/privacy>

3.4.3. As part of communicating with us, you may also submit personal information about you that we require for in our legitimate interest. This includes your name and additional contact details.

Any personal information that is provided in and during communications is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications. We will not use your personal information in an identifiable manner in any publication without your further explicit consent.

We will delete this personal data when we reasonably consider that we no longer need it for this purpose.

### **3.5 Subscribing to our general marketing**

3.5.1 If you are a customer, or have made an enquiry into our services, we will provide you with a clear choice to consent to receiving general marketing communications such as promotional material, updates, reminders and communications by giving you an opt-in to receiving such communications. If you have provided your consent we will collect your contact details (name and email address) to provide you with such communications. You have the right to withdraw your consent at any time. For full details on how to withdraw consent please see below.

We will collect your personal information in an electronic form via our website. All electronic files are stored on our PCs or on the servers of Electronbox / PC Doctor (p.3.2).

Electronbox's privacy notice can be found at [www.electronbox.net](http://www.electronbox.net)

If you ever decide you no longer wish to receive our marketing communications, you opt out at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email, or by using the contact details below. If you do unsubscribe, please note that we will still keep your details in our system marked as 'denied' so that we can make sure that you do not receive our marketing communications again in the future.

3.5.2 We are using Flodesk email marketing service provider to deliver our marketing communication to email. Flodesk Data Processing Addendum, GDPR Compliance and Flodesk Terms of Service can be located at <https://help.flodesk.com/en/collections/1860807-security-and-compliance>

## **4. Disclosure of personal information**

We will not usually disclose your personal information other than as already explained in Section 2 and 3 above. However, there may be circumstances where we need to share personal information other than as anticipated in Section 2 and 3 above. These include:

4.1.1 where we are legally required to disclose the information. This includes sharing the personal information with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;

4.1.2 where we need to disclose the personal information for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;

4.1.3 disclosure is required to protect the our interests, or someone else's interests (for example, to prevent fraud);

4.1.4 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);

4.1.5 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal information in the same way that we do and notify you of any changes to this privacy notice; and

4.1.6 to any prospective purchaser of our business assets or organisation.

## **5. Keeping personal information secure**

We know that you provide your personal information in good faith and expect it to be looked after. This is why we take the security of your personal information seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal information. This includes:

- (a) keeping special categories of data in a separate password protected file to all other personal information;
- (b) locating all personal information that we control on servers located in France;
- (c) ensuring strict access controls on a need to know basis; and
- (d) monitoring access to the personal information.

## **6. Your rights**

You have rights in respect of your personal information and this Section explains a bit more about those rights that are applicable to what we do with your personal information and when you can exercise them. If you would like more information about any of your rights, please contact us on the details set out below.

### **6.1. Withdrawing consent**

Where you have explicitly consented to us processing special categories of data, you can withdraw consent to our processing the special categories of data at any time during the application process. If you wish to withdraw consent, please do so by sending your request in writing to our contact details below.

### **6.2. Accessing your personal information**

We want you to fully understand and be comfortable with how we use your personal information. You can contact us at any time to ask whether we process any personal information about you. If we do hold or use your personal information in any way, you have the right to access that personal information. All we ask is that:

- 6.2.1 you make your request to access in writing to the contact details below;
- 6.2.2 you verify your identity; and
- 6.2.3 you are fair and reasonable with how often you make this kind of request (otherwise we may be entitled to charge a fee for handling excessive requests). Please allow us up to one month from receipt of your request in order to provide a response.

### **6.3. Requesting more information**

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal information. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal information develops. However, if you have any questions regarding our use of your personal information, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on the contact details below.

### **6.4. Additional rights**

You also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact addresses below and provide verification of your identity.

6.4.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)

6.4.2 You have the right to request that we erase your personal information. Please be aware that we can only comply with such a request if

- (a) your personal information is no longer required for the purposes it was collected for (for example, we need your personal information to respond to a communication);
- (b) the collection, storage or use of the personal information by us is prevented by law;
- (c) your personal information is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.

6.4.3 You have the right to request that we restrict or refrain from processing your personal information:

- (a) for the time it takes us to verify the accuracy of your personal information where you have disputed its accuracy;
- (b) where the collection, storage or use of the personal information by us is unlawful but you decide not to ask for erasure;
- (c) where, we no longer need your personal information but you need them for the purposes of establishing, exercising or defending a legal claim;
- (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal information, where you have exercised your right to object to processing.

6.4.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a

contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.

6.4.5 You have the right to object to our use of your personal information:  
(a) where we are using that information based on our legitimate interests, and where we do not have compelling overriding grounds to continue to use your personal information; or  
(b) at any time, where we use your personal information to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

## **7. Updating this privacy notice**

We keep our privacy notice under regular review in order to ensure that it properly reflects our use of personal information. This privacy notice was last updated on May 03, 2021.

## **Contacting Us**

You can contact us by: [info@annakotskaya.com](mailto:info@annakotskaya.com)