

Who we are

Our website address is: <http://www.positiveneil.com>

This website is the property of Jordunn Enterprises Limited. We take the privacy of all visitors to this Website very seriously. In this privacy and cookies policy we have set out our position regarding certain privacy matters and the use of cookies on this Website.

This policy covers all data that is shared by a visitor with us when visiting our website or when contacting us directly by email or by phone. This policy has been created for us by Ares Risk Management Limited and has been approved by Neil Jordan, Managing Director, Jordunn Enterprises Limited and is occasionally updated, to reflect changes in Data Protection & Online Privacy Legislation, therefore, we suggest you review this page from time to time.

This policy provides an explanation as to what happens to any personal data that you share with us, or that we collect from you either directly via this Website, by phone or via email.

What personal data we collect and why we collect it

Comments

When visitors leave comments on the site (in our blog) we collect the data shown in the comments form. This data might include the visitor's IP address and browser user agent string to help spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here:

<https://automattic.com/privacy/>. After approval of your comment, your profile picture is visible to the public in the context of your comment.

Members Zone

When registering for an account in our members' zone, you will be asked for your name, email address and other contact information. This data will be stored for as long as you are subscribed as a member. You have 100% control over the data you provide when registering to our membership site. When you cancel your membership, we will only retain the financial data pertaining to your subscription in compliance with UK Tax Law, all other data will be immediately and permanently deleted from our systems.

Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

Contact forms

When you send me a message using the contact form, my website will create meta-data associated with your message, as well as collect your name and the content of your message. The meta-data helps me to make sure that my website is secure and working properly, and I need your name and your message in order to be able to respond to you and your request. This data will be kept only for as long as it is necessary to respond to you and provide you with any service which you may have requested.

Cookies

If you leave a comment on our site you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

We use analytic cookies, which help us to understand how you use our website so that we can improve the website and develop new content which may enhance your user experience. (See more in Analytics below)

The membership area of our website uses authentication and security cookies to be able to prevent data breaches of our members' area and thereby protect your account data

Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behave in the exact same way as if the visitor has visited the other website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

Analytics

We use Google Analytics to understand how visitors use our website. The analytics data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of service use. The legal basis for this processing is consent and our legitimate interests, namely monitoring and improving our website and services. You can read Google's Privacy Policy here: <https://policies.google.com/privacy>

Who we share your data with

In the main we do not share your data, unless it is absolutely necessary to do so in order to providing our services to you. In situations where this might be necessary, who we might share your basic personal data with, why and how, will be clearly and fully explained in your service agreement with us.

When you sign up to to our Mailing List, you will be asked to provide us with your name and your email address which will be stored with our Mailing List Service Provider, **Active Campaign**. Active Campaign is a US based service provider and data sharing is undertaken in line with the EU-US Privacy Shield Framework. You can read Active Campaigns' Policies here: <https://www.activecampaign.com/tos/>

When you purchase one of our online training courses or purchase tickets to one of our Workshops, Seminars or Events, we use Stripe to transact your payments. When using Stripe for this purpose you have the choice to sign-up for an account with Stripe, use your Stripe account if you are a pre-existing user of the Service or use

Stripe as a “one-time-only” service. Stripe have their own Privacy Policy which can be found here:
<https://stripe.com/gb/privacy>

How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue. You have the right to ask us to delete your comment if you so choose. If you ask us to delete a comment, this will be done within 48 hours of receiving your request.

If you sign up to our mailing list, you will find an Unsubscribe link in the footer of every email we send. You are free to unsubscribe from our mailing list at any time. The minute you unsubscribe your name and email address will automatically and instantly be removed from the list.

Transaction data which is processed for us by Stripe will be downloaded to our secure systems and retained for 7-years in accordance with UK Tax Law. Stripe will retain the transaction data they have processed on our behalf in accordance with Banking and Financial Regulations which are detailed in their Privacy Policy
<https://stripe.com/gb/privacy>

If you have purchased a place on one of our workshops or seminars, your name, email address along with the ticket information of what you have purchased from us will be retained for up to a maximum of 1-year; after which your personal data will be deleted. What we will keep is an anonymised record of workshop and seminar popularity based on the number of tickets sold.

If you have purchased subscription to our membership services, you have total control over your data and as soon as you cancel your membership, all bar the transaction data will be deleted from our systems immediately. (See Transaction data above) .

What rights you have over your data

If you have a membership account on this site, or have left comments in our blog, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us.

We have made it as easy as possible for you to manage and control the data that you have shared with us in the membership area. As we have said before you have 100% control of your own data in the membership area, and can exercise all your rights as listed below by logging-in to your secure area on our website.

If you do not subscribe to the membership area of our website, it is possible that you might have shared your data with us directly. If this is the case you can exercise your rights as listed below.

All our customers, subcontractors and suppliers have the following rights to their data under the GDPR:

1. the right to access;
2. the right to rectification;
3. the right to erasure;
4. the right to restrict processing;
5. the right to object to processing;
6. the right to data portability;
7. the right to complain to a supervisory authority; and
8. the right to withdraw consent.
9. request that we erase any personal data we hold about you.

With regards to erasing your data, we will erase all trace of you from our systems excluding any data we are obliged to keep for administrative, legal, or security purposes. When you make a request to us to erase your data, we will email you to notify you that your request has been action and highlight any data which we may have had to keep in compliance with regulations and legislation to which we are bound.

Should you at any time wish to exercise your data rights please email us with your request at:
hi@positiveneil.com

Where we send your data

With the exclusion of **visitor comments** which may be checked through an automated spam detection service; we don't send your data anywhere, we keep it safely and securely on our in-house systems or locked away in hard-copy in our filing cabinets.

Your contact information

If you have left a comment on our website which has been approved for publication in addition to the body of your comment, your published entry may include the user name you created when you registered to leave the comment.

If you email us directly we will keep your name, email address and any other contact details you have provide in a secure manner on our systems so that we can respond to your enquiry efficiently and effectively.

If you phone us with a service enquiry, we will ask you for your name, phone or mobile number and email address so that we can respond and deal with your service enquiry efficiently and effectively.

If you sign up to our mailing list, we will collect your name and email address only.

How we protect your data

Website: We utilise SSL technology on our website. To protect the integrity of our website and any personal data you might submit when you choose to register to leave comments or when subscribing to our membership area.

Mailing List: We have done our due diligence and trust Active Campaign to protect you data in accordance with the highest standards in Cyber security – you can find out more about Active Campaign's Cyber Security measures here <https://www.activecampaign.com/security/>

Internal Systems: PositiveNeil utilises anti-virus, anti-malware, advance Firewall and file-locking systems to protect any and all data which we might store and process on our internal computer systems.

What data breach procedures we have in place

In the event of a data breach you and the UK Regulatory Authority (The Information Commissioners Office) will be notified within 72 hours of such an event occurring and provided with detailed information on what happened, how it happened, what we have or are doing to put things right and what steps you might need to take to protect your membership account with us (if any).

What third parties we receive data from

We do not accept personal data from third parties unless they can prove they have explicit consent from you, to share your data with us.

What automated decision making and/or profiling we do with user data

PositiveNeil does not undertake any automated decision making neither do we use any data you might provide to us for profiling.

Industry regulatory disclosure requirements

PositiveNeil is a subsidiary of Jordunn Enterprises Limited Company Registered in England & Wales, our Registered address is: 20-22, Wenlock Road, London, England, N1 7GU. Our Company Registration Number is: **10337974**

Our contact details are in the footer of every page on this website.