



Privacy Policy

Welcome to COCOON COACHING SOLUTIONS' privacy policy. At COCOON, we respect your privacy and are committed to protecting your personal data and following the UAE national privacy principles under the Privacy Act.

1. Introduction

This privacy policy tells you how COCOON will use your personal data when you visit our website, interact with us, and buy our goods and services.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

This privacy policy was last updated on 14th of May 2019. If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy. See How to contact COCOON about privacy below.

2. Our website

Our website at cocooncoachingsolutions.com, is a Family Coaching Practice and platform of support for parents. This website is not intended for children and we do not knowingly collect data relating to children on this website.

COCOON is made up of one legal entity:

- COCOON COACHING SOLUTIONS FZ LLE.

3. Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about our wonderful customers (you!) and visitors to the COCOON website. This personal data falls into these categories:

Identity Data includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media user name.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data which may include payment card details.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Profile Data includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using analytics and profiling).

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.



Usage Data includes information about how you use our website, products and services.

Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

Marketing and Communications Data includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

We also collect and use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. To provide better content and service, COCOON's website uses the Google web analytics service and records mouse actions and scrolling movement, as well as basic interactions with website forms. We do not track your browsing habits across other third-party websites and all information about you which reaches Google contains no personal data about you. Please see the Google privacy policy for further information.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. If you use any of these types of personal data on products you design or create on moo.com, we will not be able to tell. We will treat all the personal data included in designs or products as ordinary personal data.

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- a) Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

This includes personal data you provide when you:

- sign up to receive the COCOON newsletter;
- make enquiries or request information to be sent to you;
- order our products or services;
- ask for marketing to be sent to you;
- engage with us on social media;
- enter a competition, promotion or survey;
- contact customer services; or



- leave comments, testimonials or reviews on our products or services (please be kind!).
- b) Automated technologies or interactions. As you interact with us, including via the cocooncoachingsolutions.com website, we may automatically collect Technical Data about equipment, browsing actions and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts.

5. How we use your personal data

- Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you purchase our products or services, that's a contract.
- Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Generally, we do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

6. Advertising, marketing and your communications preferences

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them. This is what we call direct marketing.

We may carry out direct marketing by email, phone, text or post. For example, you might have the COCOON newsletter hit your inbox or a cool promotion land on your door mat.

On our website, we always try hard to make it really clear what we are doing and what communications you will be sent, whether it's you deciding to sign up to the COCOON newsletter or as part of creating an account or the purchase journey – and you have a right at any time to change your mind and say no thank you and opt out (but we'd be really sorry to see you go, so please gives us a chance by fine tuning your preferences before really leaving us!). The easiest way to opt out is to use the unsubscribe link at the bottom of the communication.

Of course, there are lots of different ways you'll see adverts and not all of these are based on using personal data – sometimes we just buy good old-fashioned advertising space in the real world and websites and social media. If you see COCOON's adverts on websites and in social media, these may not be directed specifically at you, we might just have bid for the space. But here's some things we may do that may be specifically directed at you:

- emails, for example the COCOON newsletter;
- text messages or social media promotions, for example with discount codes;
- phone calls, to tell you something that might be relevant to you and your business.

Tracking Data, and in particular cookies, help us to deliver website and social advertising that we believe is most relevant to you and to potential new customers of COCOON.

7. Cookies

You can see from Advertising, marketing and your communication preferences, that cookies are a tool we (and everyone one else who operates online) use for advertising.



When you use cocooncoachingsolutions.com, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Suppliers and service providers (such as technology service providers, payment processing and fraud prevention providers, manufacturers and post and courier services);
- auditors and professional advisers like bankers, lawyers, accountants and insurers; and
- government, regulators and law enforcement.

We also share data with third parties connected to advertising, retargeting and analytics.

We may also share data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. Payment information

COCOON currently does not use third party payment processors. This may change and policy will be reviewed and amended as a result.

For PayPal, we would only store the tokens required to identify the transaction with PayPal, issue refunds and identify transactions made using PayPal.

10. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



11. Third-party links

This website may include links to third-party websites, plug-ins and applications (for example, the ability to sign in with Facebook). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

12. Data retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers for tax purposes.

In some circumstances you can ask us to delete your data

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

13. Your legal rights

You will not have to pay a fee to access your personal data.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. A little request from COCOON to you

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by updating your account. Thank you.

15. Changes to this privacy policy

You may see little updates to our privacy policy over the coming months. Be sure to check in and have read every now and then. Thank you!