

# Privacy Statement

This privacy statement provides information how and why ILC International processes your personal data and what your rights are, related to the marketing and management of ILC International.

If you have any questions, please contact us at the following email: [enquire@inalifecoaching.com](mailto:enquire@inalifecoaching.com) or via mailing address: Sofia, Lozenec, 1 Persenk Str, entr. A, apt. 3.

If you would like to confirm that ILC International processes your personal data, or to access the personal data that ILC International may have for you, please contact us via e-mail: [enquire@inalifecoaching.com](mailto:enquire@inalifecoaching.com).

## I. INTRODUCTION

ILC International is a company which offers coaching services and psychology services in the following areas of expertise: Entrepreneurial Coaching (addressing the unique challenges of Start-ups and Founders), Business Trainings & Team Interventions, Career Changes & Purpose Finding, Quarter and Mid-Life Crisis Periods, Organizational Psychologist (Developing Tailored Strategies for Managing Human Resources).

Our major priority is to work ethically and responsibly, in order to comply with the legislation, including in the field of personal data protection, and to meet your expectations with regard to processing your personal data. We are trained and obliged to protect the privacy of customers' personal data.

In order to manage and grow its business, ILC International processes personal data of the following main categories of data subjects:

PERSONS, WHO ARE CLIENTS OF ILC INTERNATIONAL

PERSONS, WHO ARE SUBSCRIBERS FOR DIRECT MARKETING MESSAGES AND NOTIFICATIONS FROM ILC INTERNATIONAL

LAWS AND / OR AUTHORIZED REPRESENTATIVES AND CONTACT PERSONS OF ANY CORPORATE ORGANIZATION WHICH HAS A CONTRACTUAL RELATIONSHIP WITH ILC INTERNATIONAL

## II. WHEN CAN WE PROCESS YOUR PERSONAL DATA

The law allows us to process personal data if one or more of the following conditions are present:

- If we perform a contract to which you are a party or if you have taken action to conclude a contract with us;
- When we have an obligation stipulated by law;
- When there is a legitimate interest;
- When we have your consent.

A legitimate interest is deemed to be the processing of personal data carried out due to economic, commercial or other interest of ILC International or of a third party that is superior to the interest of the person and the processing does not violate their rights. Even if there is such interest, our actions in relation to you will always be fair and transparent and in any case they will be subject to a preliminary assessment of ILC International or the third-party's interest and the rights of the individuals.

### III. HOW, WHY WE PROCESS YOUR PERSONAL DATA. FOR HOW LONG WE WILL KEEP YOUR PERSONAL DATA

The information below applies both to data subjects who have provided their personal data to ILC International and to those whose personal data have been provided to ILC International by third parties.

ILC International, ID: 205545939, with headquarters in Sofia, Lozenec, 1 Persenk Str, entr. A, apt. 3, Republic of Bulgaria, represented by Valentina Boyanova Dolmova – CEO, in the capacity of an administrator of personal data processes the following data:

#### PERSONS, WHO ARE CLIENTS OF ILC INTERNATIONAL

ILC International processes the following categories of personal data of existing and potential customers and other individuals interested in marketing activities organized by ILC International and whose data is included in our marketing database:

Data for physical identity: name, surname, family name, email, phone number.

#### PERSONS, WHO ARE SUBSCRIBERS FOR DIRECT MARKETING MESSAGES AND NOTIFICATIONS FROM ILC INTERNATIONAL

ILC International processes the following categories of personal data of existing and potential customers and other individuals interested in marketing activities organized by ILC International and whose data is included in our marketing database:

Data for physical identity: name, surname, family name, email.

#### LAWS AND / OR AUTHORIZED REPRESENTATIVES AND CONTACT PERSONS OF ANY CORPORATE ORGANIZATION WHICH HAS A CONTRACTUAL RELATIONSHIP WITH ILC INTERNATIONAL

(collectively referred to as "Counterparties")

ILC International processes the following personal data for its Counterparties:

- Minimum amount of personal data required for signing the respective contract - names and personal identification number. Identity card data shall be used only if the contract is concluded by notarial certification or by signing by an authorized representative through a notarized power of attorney;
- Personal contact information during the course of the contract - this information is limited to the types of information that may be included in business cards: name and title, position, employer name, business address, business email address and business phone number.

We receive from our Counterparties such personal information (contact information) of employees or other persons to whom our Counterparties have assigned to be contact persons under the relevant contract. Our counterparties providing us with this data are also data controllers in respect of the data in question and are responsible for providing the data subjects concerned with all relevant information in this regard. Moreover, our Counterparties are obliged to ensure the accuracy of this data and to keep it up-to-date throughout. This means that if any information provided to us is no longer up-to-date, we must be duly informed as soon as possible. Until we receive such notice, we agree that the contact information provided to us is accurate and may be used for the purposes set out below.

We use your personal information to know you as a client or a partner, to develop and improve our services, and to ensure that we comply with the laws that regulate our business.

We have compiled this detailed list to inform you of the purposes for which we use personal data and what our reasons are. Here you will find out which our legitimate interests are.

<b>Why do we process personal data:</b>	<b>Reason:</b>
<p><b>To know who you are</b></p> <p>The nature of our work requires that identify our customers. This means that we should collect your personal data, for the minimum for physical identification.</p>	Your consent
<p><b>To conclude a contract and execute it</b></p> <p>We process your personal data in order to enter and maintain contractual relations with you, and our legal obligation is to store these data even after their completion.</p>	Legal obligation  Your Consent
<p><b>To improve our services</b></p> <p>We want to be confident that we provide our clients with the best possible and highest quality services. That is why we are developing new services, and analysing information which helps us discover new business opportunities.</p>	Legitimate interest
<p><b>To learn first about our products and services (so called direct marketing)</b></p> <p>We are constantly expanding our portfolio of services and setting better conditions for customer satisfaction. When we assume you might be interested in our particular offer, we have the legitimate interest in sharing it with you. We do not want to provide you with unnecessary or annoying advertising content which is why we use your personal information to decide what, how and when to offer to you.</p> <p>If you choose not to receive information about our current products and services, we will always provide you with the opportunity to inform us about that. When you inform us that you do not want to receive such information, we will endeavour to comply with your request immediately.</p>	Legitimate interest
<p><b>To fulfill a purpose for which you have given your consent</b></p> <p>In certain cases, when another condition is not applicable and for the fulfilment of a specific purpose, ILC International will need your consent to process your personal data.</p> <p>If we need your consent, we will require it from you in a clear and open way. You will be able to withdraw your consent and ILC International will cease processing your information for that purpose.</p>	Your Consent

#### IV. WHAT YOUR RIGHTS ARE

If you are a person whose personal data is processed by ILC International, as per any of the circumstances above, you have the following rights:

##### RIGHT TO ACCESS

You can always ask us whether we process your personal data and if so, to be informed about what information we store, why we store it and how we process it. You are also entitled to a copy of this information.

##### RIGHT TO CORRECT

We would like your personal data to be accurate and up-to-date. If any piece of your personal data is inaccurate or out-of-date, please inform us and we will correct it.

##### RIGHT TO DELETION

You may ask ILC International to delete your personal data, but the relevant legal grounds should apply in order to fulfil the request. We will not delete any information about you that we are legally required to keep as well as if we have grounds not to delete this information. We will have one month to answer your request. If we refuse to delete the information, we will provide the basis for our decision and the legal grounds for it.

##### RIGHT TO RESTRICT DATA PROCESSING

In certain cases you may request ILC International not to process your personal data, including deleting them, in order to protect your legal claims.

##### RIGHT TO OBJECTION

As we have already stated in this Notice, in certain cases we process your personal data due to ILC's legitimate interest. You have the right to object to this processing, including when it is profiling. We will discontinue processing your personal data only if we are convinced that ILC's interest has no advantage in the specific situation.

We remind you that at any time you can easily express your will not to receive advertising content. In such case, we will immediately discontinue processing your personal data for the purposes for sending advertising content.

##### RIGHT TO DATA PORTABILITY

You may request ILC International to put your data in an electronic file and give it to you or to a third party. The data you can request may only be data we have received in connection with a contractual relation or with your consent and is automatically (electronically) processed.

#### V. HOW TO EXERCISE YOUR RIGHTS

You may exercise any of the above rights personally or through an expressly authorized person, as well as electronically in accordance with the Electronic Document and Electronic Certification Services Act:

- via email to: [enquire@inalifecoaching.com](mailto:enquire@inalifecoaching.com)
- via regular mail, addressed to: ILC International, ID 205545939, Sofia, Lozenec, 1 Persenk Str, entr. A, apt. 3, Republic of Bulgaria.

## VI. WITHDRAWAL OF CONSENT

You have the right to withdraw your consent at any time if such was necessary to process your personal data. This withdrawal does not affect the legality of the processing until the withdrawal of the consent. In case you withdraw your consent, this does not affect the processing of your personal data, which is carried out on another basis and for which your consent was not required.

## VII. REQUEST FOR IMPLEMENTATION OF RIGHTS

Please note that your application to exercise any of your rights must include at least your name and other identifying information, a description of your claim, a preferred means of communication with you, a correspondence address, a signature and a date of the application.

If the application is signed by a proxy, you must also attach the proxy to it.

ILC International may contact you for further information if your identity is required to be verified or your application is further specified.

## VIII. COMPLAINT TO A SUPERVISORY AUTHORITY

If for any reason you are not satisfied with ILC's actions in relation to your personal data, we would like you to tell us first in order to understand what the problem is and try to resolve it.

We will look carefully at your complaint and will answer all of your questions. Nevertheless, if you believe that you have not received adequate assistance from ILC International or that there is a violation of your rights, you have the right to complain to a supervisory authority. In the Republic of Bulgaria this authority is the Commission for Personal Data Protection.

## IX. TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA

We believe your personal data is confidential and we value its privacy. Therefore, we pay close attention to processing which is related to disclosing or providing your personal data to third parties. Whenever we disclose your personal data, this is imperative to meet the above goals.

## X. FOR HOW LONG WE WILL KEEP YOUR PERSONAL DATA

The period for storing your personal data depends on the relations you have with ILC international. When you apply for any of our services but you decide to withdraw your application, your personal data will be stored for a limited period of time (1 year).

If you are our client and use ILC's services, we are legally obliged to store your personal data not only for the period of completion of our contractual relations but for a period of 5 years after their completion. In some cases, this period may be extended to 7 years if this is required by a competent state authority.

If you take advantage of your right to limit data processing, ILC International will store your personal data until you specify otherwise.

## XI. UPDATING AND AMENDING THE NOTICE

We shall regularly update this Notice so that you can be duly informed about how we process your personal data. If we make any amendments which are essential to the purposes and grounds for processing, we will publish a notification on our website [www.inalifecoaching.com](http://www.inalifecoaching.com).

This Notice on the processing of personal data was last updated on 01.08.2019.

This document is a privacy notice within the meaning of Art. 13 and Art. 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (General Data Protection Regulation).