

## **PRIVACY POLICY**

**Updated: November 18, 2020**

The website [www.soniamevans.com](http://www.soniamevans.com) and its content is owned and operated by Sonia Evans Coaching, LLC, a Colorado Limited Liability Company (hereinafter “Company “we” or “us”). The term “you” refers to the user, visitor or viewer of the Sites.

We are dedicated to maintaining your privacy and protecting your personal information online. This Privacy Policy (“Policy”) applies to (i) the website owned and operated by Sonia Evans Coaching, LLC at [www.soniamevans.com](http://www.soniamevans.com) and/or (ii) **any mobile site or third party applications or websites (including sign-up pages, landing pages, invoices, check-out pages or advertisements or offerings to which these Terms of Use are attached or referred to;** (iii) any online platform or forum operated by Company (for any purpose), whether on a website hosted by Company or a third-party website such as an online course platform, zoom, or facebook.com. (individually and/or collectively the “Sites”).

This Policy does not apply to your interaction with the Company or any of its agents or employees offline.

**By using the Sites, you consent to the terms of this Policy and to Company’s collection of your personal information for the purposes stated below.**

**IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY  
YOU ARE NOT PERMITTED TO USE THE SITES.**

### **A. Privacy Policy Introduction**

This Policy describes how we collect, use, process and distribute your information, including Personal Data (as defined below) used to access the Sites. We will not use or share your Personal Data with anyone except as described in this Privacy Policy. Use of any personal information or contribution that you provide to us, or which is collected by us on or through our Sites or its content is governed by this Policy.

In the event of a conflict between this Policy and any other separate legal contract entered into between you and Sonia Evans Coaching, LLC, such separate legal contract shall prevail and control.

### **B. Minors/Children’s Online Privacy Protection Act Compliance**

**IF YOU ARE 18 YEARS OR YOUNGER, PLEASE DO NOT USE THE SITE OR ANY OF ITS SERVICES FOR ANY PURPOSE.**

If you are a minor under the age of 18, you are not permitted to submit any personal information or data to the Site. We do not collect any information from anyone under 18 years of age in compliance with COPPA (Children’s Online Privacy Protection Act) and the GDPR (General

Data Protection Regulation of the EU). **Our Sites and their content are directed to individuals who are at least 18 years old or older.**

### **C. What Data Do We Collect About You, For What Purpose and on What Grounds Do We Process It?**

Personal Data means any information capable of identifying an individual. It does not include anonymized data.

#### 1. We may process the following categories of Personal Data about you:

**(a) Communication Data** that includes any communication that you send to us whether that be through the contact form on our Sites, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

**(b) Customer Data** that includes data relating to any information voluntarily provided to us or related to the purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your credit/debit card details. We process this data to supply the information, goods and/or services you have requested and/or purchased and to keep records of such transactions. Our lawful grounds for this processing include consent, the performance of a contract between you and us and/or taking steps at your request to enter into such a contract, to keep records and to establish, pursue or defend legal claims.

**(c) User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases and to enable publication and administration of our website, other online services, and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

**(d) Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. We process this data to analyze your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

**(e) Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is either consent or our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

**(f)** We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content, information and advertisements to you (including Facebook advertisements or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests.

2. Sensitive Data. We do not collect any Sensitive Data about you through our Sites. Sensitive data refers to data that 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.

Note that where we are required to collect Personal Data by law, or under the terms of a separate contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

3. Use. We will only use your Personal Data for a purpose it was collected or for a reasonably compatible purpose if necessary. We may process your Personal Data without your knowledge or consent where this is required or permitted by law.

## **D. How We Collect Your Personal Data**

1. Information you Voluntarily Provide to Us. (for example, by filling in forms on our Sites, or by sending us emails). The information we collect depends on the context of your interactions with us and the Site, the choices you make and the products and features you use.

2. Information Automatically Collected. We may automatically collect certain information when you visit, use or navigate the Sites. This information does not reveal your specific identity but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Site and other technical information. If you access our site with your mobile device, we may automatically collect device information, operating system, version information and IP address. This information is primarily needed to maintain the security and operation of our Site, and for our internal analytics and reporting

purposes. We may also automatically collect certain data from you as you use our Sites by using cookies and similar technologies. Please see our [Cookie Policy](#) below for more details about this.

3. **Information from other Sources.** We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms and advertising networks, (such as Facebook), analytics providers, providers of technical, payment and delivery services, data brokers or aggregators as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links)

#### **E. Opting Out/Unsubscribing/Updating Your Data**

You can ask us to stop sending you marketing messages at any time by following the unsubscribe links on any marketing message sent to you OR by emailing us at [sonia@soniaevanscoaching.com](mailto:sonia@soniaevanscoaching.com). Please state “Unsubscribe” or “Opt-Out” in your subject headline.

If you unsubscribe or opt out of receiving marketing communications this opt-out does not apply to communications required as a result of other transactions, such as purchases, contracts, warranty registrations, etc.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [sonia@soniaevanscoaching.com](mailto:sonia@soniaevanscoaching.com).

#### **F. How We Use Your Personal Data**

We process your Personal Data in accordance with applicable law and in reliance on your consent, per a separate contract in order to provide/process goods or services, or our legitimate business interests (“Business Purposes”). We use the information we collect or receive for the following:

**(a) Marketing and Promotional Use.** Our lawful ground of processing your Personal Data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business). We may use personal information about you to enhance our marketing and promotional efforts and to improve our content and services. We may also use your Personal Data to deliver to you advertisements, new services and promotions, and other information to you that is targeted to your interests. You will have the ability to not receive such advertisements, promotions, notices, and information by contacting Sonia Evans Coaching, LLC and requesting to no longer receive such notices, or by clicking “unsubscribe” on any email.

**(b) Administrative Notices.** We may use your e-mail address, your mailing address, and phone number to contact you regarding administrative notices, sending you service messages (for

example, to re-set a password), to respond to requests by you, or to inform you about products , services, promotional offerings, or new feature information, communications relevant to your use of the Site, or information about changes to our terms, conditions, policies or the Site and its content. You will have the ability to not receive such advertisements, promotions, notices and information by contacting [sonia@soniaevanscoaching.com](mailto:sonia@soniaevanscoaching.com) and requesting to no longer receive such information .

**(c) Fulfill and manage orders you request.** We may use your Personal Data to fulfill and manage your orders, payments, returns, and exchanges made through the Sites, including collecting and recovering money owed to us.

**(d) To receive permission to post your testimonial** with your name. We do not post testimonials on our Site that contain personally identifying information. Prior to posting a testimonial that includes your full name, we will obtain your consent to use your name and testimonial.

**(e) Deliver targeted advertising to you for our Business Purposes and/or with your Consent.** We may use your Personal Data to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness. We may use your Personal Data to run social media advertisements and / or create look-alike audiences for advertisements.

**(f) Administer prize draws and competitions for our Business Purposes and/or with your Consent.** We may use your Personal Data to administer prize draws and competitions when you elect to participate in competitions.

**(g) Request Feedback for our Business Purposes and/or with your Consent.** We may use your Personal Data to request feedback and to contact you about your use of our Site.

**(h) To protect our Site for Business Purposes and/or Legal Reasons.** We may use your Personal Data as part of our efforts to keep our Site safe and secure (for example, for fraud monitoring and prevention).

**(i) To enable user-to-user communications with your consent.** We may use your Personal Data in order to enable user-to-user communications with each user's consent.

**(j) To enforce our terms, conditions and policies for our business purposes and as legally required.**

**(k) To respond to legal requests and prevent harm as legally required.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond. We may need to use your Personal Data in order to troubleshoot or resolve disputes between us.

**(l) For other Business Purposes.** We may use your Personal Data for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional

campaigns and to evaluate and improve our Site, products, services, marketing and your experience.

## **G. Disclosure to Third Parties**

1. We do not sell or rent any personally identifiable information about you to any third party, unless otherwise expressly stated in this Policy. We use practices that are consistent with standards in our industry to protect your privacy. We cannot, however, promise that your personally identifiable information or private communications will remain private. For example, third parties may unlawfully intercept or access transmissions or private communications on our Sites.

2. The following describes some of the ways that your personally identifiable information may be disclosed:

**(a) Disclosures Required by Law.** We reserve the right at all times to disclose any information about you as necessary to satisfy any applicable law, regulation, legal process or governmental request. We reserve the right to fully cooperate with any law enforcement authorities or court orders requesting or directing us to disclose the identity of anyone posting any content or publishing or otherwise making available any materials on the Site. **BY ACCEPTING THIS AGREEMENT, YOU WAIVE ALL RIGHTS AND AGREE TO HOLD US HARMLESS FROM ANY CLAIMS RESULTING FROM ANY ACTION TAKEN BY US DURING OR AS A RESULT OF ANY INVESTIGATIONS AND/OR FROM ANY ACTIONS TAKEN AS A CONSEQUENCE OF ANY INVESTIGATION BY EITHER US OR LAW ENFORCEMENT AUTHORITIES.**

**(b) Advertisers.** We may disclose aggregate information about our users to advertisers and for other marketing and promotional purposes. However, we do not disclose any personally identifying information to any of these entities. We may use third-party advertising companies to serve ads when you visit the Site. These companies may use information about your visits to our Site and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you

**(c) Third-Party Suppliers.** We may use third-party suppliers to assist us in providing the services available on an outside website.

**(d) Professional Advisers.** We may share your Personal Data with professional advisers including lawyers, bankers, auditors, accountants and insurers.

**(e) Service Providers.** We may share your Personal Data with outside service providers who provide IT and system administration services, general administrative services or specialized services to support our business or customers. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Site, which will enable them to collect data about how you interact with the Site over time. This information may be used to, among

other things, analyze and track data, determine the popularity of certain content and better understand online activity.

**(f) Vital Interests and Legal Rights.** We may disclose your Personal Data where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

**(g) Affiliates.** We may share your Personal Data with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

**(h) With your Consent.** We may disclose your personal information for any other purpose with your consent.

**(i) Information You Share** When you share personal information (for example, by posting comments, contributions or other content to the Sites) or otherwise interact with public areas of the Sites, such personal information may be viewed by all users and may be publicly distributed outside the Sites in perpetuity.

**No Spam.** The Sites do not tolerate spam. Therefore, without limiting the foregoing, you are not licensed to add the Sites or Sonia Evans Coaching, LLC, including its agents and employees, to your mail list (e-mail or physical mail) without their express consent after adequate disclosure.

## **H. Disclosures You Make to Third Parties.**

1. We do not control the privacy policies of third parties. When you disclose information to third parties on the Sites (or any other website) about yourself, you are subject to the privacy customs and policies of that third party. It is your responsibility to find out about the privacy policy of any such third parties.

2. The Sites may include links to third-party websites, plug-ins, and applications. 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 Sites, we encourage you to read the privacy notice of every website you visit.

3. Note that whenever you voluntarily make your Personal Data available for viewing by others online through our Sites or its content, it may be seen, collected and used by others, and therefore, we cannot be responsible for any unauthorized or improper use of the information that you voluntarily share (i.e., sharing a comment on a blog post, posting in a Facebook group that we manage, sharing details on a group coaching call, etc.).

## **I. Data Security**

We take commercially reasonable steps to protect the Personal Data you provide to us from misuse, disclosure or unauthorized access. We only share your Personal Data with trusted third parties who use the same level of care in processing your Personal Data.

That being said, we cannot guarantee that your Personal Data will always be secure due to technology or security breaches. Should there be a data breach of which we are aware, we will inform you immediately.

Although we will do our best to protect your personal information, **transmission of personal information to and from our Sites is at your own risk**. You should only access the Sites within a secure environment.

## **J. Data Retention**

We will only retain your Personal Data for as long as necessary to fulfill the purposes we collected it for, unless a longer retention period is required or permitted by law (such as tax, accounting, reporting or other legal requirements).

In some circumstances, we may anonymize your Personal Data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **K. Submission, Storage, Sharing and Transferring of Personal Data**

Personal Data that you provide to us is stored internally or through a data management system. Your Personal Data will only be accessed by those who help to obtain, manage or store that information, or who have a legitimate need to know such Personal Data (i.e., our hosting provider, newsletter provider, payment processors or team members).

It is important to note that we may transfer data internationally. For users in the European Union, please be aware that we transfer Personal Data outside of the European Union. By using our Sites and providing us with your Personal Data, you consent to these transfers in accordance with this Privacy Policy.

## **L. Passwords**

To use certain features of the Sites or its content, you may need a username and password. You are responsible for maintaining the confidentiality of the username and password, and you are responsible for all activities, whether by you or by others, that occur under your username or password and within your account. We cannot and will not be liable for any loss or damage arising from your failure to protect your username, password or account information. If you share your username or password with others, they may be able to obtain access to your Personal Data at your own risk.



You agree to notify us immediately of any unauthorized or improper use of your username or password or any other breach of security. To help protect against unauthorized or improper use, make sure that you log out at the end of each session requiring your username and password.

## **M. Your Legal Rights**

1. Under certain data protection laws you have rights in relation to your Personal Data that can include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent. (For people residing within the EU) you can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

If you wish to exercise any of the rights set out above, please email us at [sonia@soniaevanscoaching.com](mailto:sonia@soniaevanscoaching.com).

2. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or we may refuse to comply with your request in these circumstances and if permitted by applicable law.

3. 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.

4. For EU Residents only. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). Please contact us first if you do have a complaint so that we can try to resolve it for you.

5. California Residents Only. California Civil Code Section 1798.83 permits California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

## **N. Cookies**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our [Cookies Policy](#).

## **O. Changes/Modifications to this Privacy Policy**

We reserve the right, at our sole discretion, to change, modify or otherwise alter our Sites, their content and this Privacy Policy at any time without notice to you. Such changes and/or modifications shall become effective immediately upon posting. The latest effective date will be highlighted at the top of the Policy.

Please review this Privacy Policy periodically. Continued use of any of information obtained through or on the Website or its content following the posting of changes and/or modifications constituted acceptance of this and any revised Privacy Policy.

### **QUESTIONS ABOUT PRIVACY POLICY/ FULL CONTACT DETAILS**

If you have any questions regarding the Site's Privacy Policy or any requests regarding your Personal Data, please contact us at:

**Full Legal Name:** Sonia Evans Coaching, LLC  
**Email:** [sonia@soniaevanscoaching.com](mailto:sonia@soniaevanscoaching.com)  
**Postal Address:** 18695 Pony Express Drive  
Parker, CO 80134