

## OUR PRIVACY POLICY

This page serves as our Privacy and Terms & Conditions. By sharing your information with us you are agreeing to this. Please take a look so that you understand what happens with your information when you decide to join us.

Your business with us is *private*. We will not share your information with 3rd parties with the exception of creating custom audiences in Facebook to advertise our services; or should the data be moved to a new customer relationship manager (CRM) service, for our continued communications use.

Recently the European Union has required companies collecting personal data to follow new privacy regulations (detailed below). We are adopting those regulations for all our users. Here is a basic overview so that you can make an informed decision about giving us your information:

- We use a customer relationship manager (CRM) called Aweber.com to save customer information. They're great, nice people, and you can see their GDPR policy [here](#).
- We use Facebook and their ad network for advertising, and we use data from our CRM to create custom audiences. You can see their policy [here](#).
- We will periodically send you emails containing great free resources and marketing of our goods and services to you ... that's how we do business; In the event we offer services of a third party, they do not have access to your data, unless you opt-in to their CRM, voluntarily
- At any time, you can use the unsubscribe link in our emails

At any time, you can request what information we store about you and/or request that we delete that data by emailing us at [info@decodingcreativity.com](mailto:info@decodingcreativity.com) and we will delete your information from our CRM and from our Facebook audiences

## GDPR COMPLIANCE STATEMENT

### INTRODUCTION

The EU General Data Protection Regulation ("GDPR") comes into force across the European Union on 25th May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21st Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to

standardize data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

## OUR COMMITMENT

DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com ('we' or 'us' or 'our') are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands of the GDPR.

DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarized in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

## HOW WE'VE PREPARED FOR THE GDPR (5/25/18)

DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com already have a consistent level of data protection and security across our organization, however, in the event we commence collecting more information from you – like credit card information, collected directly, and not through known compliant sources like PayPal or Etsy or other pay portals – it is our aim to be fully compliant with the GDPR with the new data collected, as well. Our preparation includes:

- Information Audit – carry out a company-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- Policies & Procedures – implement new data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including: –
  - Data Protection – our main policy and procedure document for data protection has been created to meet the standards and requirements of the GDPR. Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and

responsibilities; with a dedicated focus on privacy by design and the rights of individuals.

- Data Retention & Erasure – we have updated our retention policy and schedule to ensure that we meet the ‘data minimization’ and ‘storage limitation’ principles and that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new ‘Right to Erasure’ obligation and are aware of when this and other data subject’s rights apply; along with any exemptions, response timeframes and notification responsibilities.
- Data Breaches – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time. Our procedures are robust and have been disseminated to all employees, making them aware of the reporting lines and steps to follow.
- International Data Transfers & Third-Party Disclosures –DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com does not store or transfer personal information outside the EU, or US.
- Subject Access Request (SAR) – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, what exemptions apply and a suite of response templates to ensure that communications with data subjects are compliant, consistent and adequate.
- Legal Basis for Processing – we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
- Privacy Notice/Policy – we have revised our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
  - Note: As of 6/2018, our information is limited to name and email address and it is used to communicate with those who have opted in for those communications.
  - The same names and addresses may also be used for other marketing purposes of DecodingCreativity.com, writewithoutthefight.com and juliaroberts-author.com

- Obtaining Consent – we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.
- Direct Marketing – we have revised the wording and processes for direct marketing, including clear opt-in mechanisms for marketing subscriptions; a clear notice and method for opting out and providing unsubscribe features on all subsequent marketing materials.
- Data Protection Impact Assessments (DPIA) – We do not process personal information that is considered high risk, involves large-scale processing or includes special category/criminal conviction data; If we were to need to do so, we would develop stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR’s Article 35 requirements. We would further implement documentation processes that record each assessment, allow us to rate the risk posed by the processing activity and implement mitigating measures to reduce the risk posed to the data subject(s).
- Processor Agreements – where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Hosting, etc.), we have drafted compliant Processor Agreements and due diligence procedures for ensuring that they (as well as we), meet and understand their/our GDPR obligations. These measures include initial and ongoing reviews of the service provided, the necessity of the processing activity, the technical and organizational measures in place and compliance with the GDPR.
- Special Categories Data – If we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements.

## DATA SUBJECT RIGHTS

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights, we provide easy to access information via email of an individual’s right to access any personal information that DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com processes about them and to request information about: –

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed

- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (where applicable) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

## INFORMATION SECURITY & TECHNICAL AND ORGANIZATIONAL MEASURES

DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures, including: – firewall, strong passwords, no local storage of contacts, and IT best practices.

## GDPR ROLES AND EMPLOYEES

DecodingCreativity.com, writewithoutthefight.com, and JuliaRoberts-author.com have designated Julia Roberts as our Appointed Person for complying with the new data protection regulations.

If you have any questions about your data or your rights under GDPR, please contact: [info@decodingcreativity.com](mailto:info@decodingcreativity.com)