

Privacy Policy



Updated: 31st May 2012

Privacy Policy

We are committed to safeguarding the privacy of our website visitors; this policy sets out how we will treat your personal information.

Our website uses cookies. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

(1) What information do we collect?

We may collect, store and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, website navigation and *keywords used when accessing our site*);
- [(b) information relating to any transactions carried out between you and us on or in relation to this website, including information relating to any purchases you make of our goods or services;
- (c) information that you provide to us for the purpose of registering with us;
- (d) information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters;
- (e) any other information that you choose to send to us;

(2) Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We use both "session" cookies and "persistent" cookies on the website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We will use the session cookies to: keep track of you whilst you navigate the website; keep track of items in your shopping basket; prevent fraud and increase website security. We will use the persistent cookies to: enable our website to recognise you when you visit; keep track of your preferences in relation to the use of our website.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>.

The following table lists the type of information that is obtained via our Google Analytics cookies and used in Analytics reports.

Functionality	Description of Cookie	Cookie Used
Setting the Scope of Your Site Content	Because any cookie read/write access is restricted by a combination of the cookie name and its domain, default visitor tracking via Google Analytics is confined to the domain of the page on which the tracking code is installed. For the most common scenario where the tracking code is installed on a single domain (and no other sub-domains), the generic setup is correct. In other situations where you wish to track content across domains or sub-domains, or restrict tracking to a smaller section of a single domain, you use additional methods in the ga.js tracking code to define content scope.	All Cookies
Determining Visitor Session	The Google Analytics tracking for ga.js uses two cookies to establish a session. If either of these two cookies are absent, further activity by the user initiates the start of a new session. See the Session article in the Help Center for a detailed definition and a list of scenarios that end a session. You can customize the length of the default session time using the _setSessionCookieTimeout() method. This description is specific to the ga.js tracking code for web pages. If you use Analytics tracking for other environments—such as Flash or mobile—you should check the documentation for those environments to learn how sessions are calculated or established.	__utmb __utmc
Identifying Unique Visitors	Each unique browser that visits a page on your site is provided with a unique ID via the __utma cookie. In this way, subsequent visits to your website via the same browser are recorded as belonging to the same (unique) visitor. Thus, if a person interacted with your website using both Firefox and Internet Explorer, the Analytics reports would track this activity under two unique visitors. Similarly if the same browser were used by two different visitors, but with a separate computer account for each, the activity would be recorded under two unique visitor IDs. On the other hand, if the browser happens to be used by two different people sharing the same computer account, one unique visitor ID is recorded, even though two unique individuals accessed the site.	__utma
Tracking Traffic Sources & Navigation	When visitors reach your site via a search engine result, a direct link, or an ad that links to your page, Google Analytics stores the type of referral information in a cookie. The parameters in the cookie value string are parsed and sent in the GIF Request (in the utmcc variable). The expiration date for the cookie is set as 6 months into the future. This cookie gets updated with each subsequent page view to your site; thus it is used to determine visitor navigation within your site.	__utmz
Custom Variables	You can define your own segments for reporting on your particular data. When you use the _setCustomVar() method in your tracking code to define custom variables, Google Analytics uses this cookie to track and report on that information. In a typical use case, you might use this method to segment your website visitors by a custom demographic that they select on your website (income, age range, product preferences).	__utmv
Website	You can use Google Analytics with Google Website Optimizer	__utm

Optimizer (GWO), which is a tool that helps determine the most effective design for your site. When a website optimizer script executes on your page, a `_utmx` cookie is written to the browser and its value is sent to Google Analytics.

Once the cookies are set/updated on the web browser, the data they contain that is required for reporting purposes is sent to the Analytics servers in the GIF Request URL via the `utmcc` parameter.

Cookies Set By Google Analytics

Google Analytics sets the following cookies as described in the table below. A default configuration and use of Google Analytics sets only the first 4 cookies in the table.

Name	Description	Expiration
<code>__utma</code>	This cookie is typically written to the browser upon the first visit to your site <i>from that web browser</i> . If the cookie has been deleted by the browser operator, and the browser subsequently visits your site, a new <code>__utma</code> cookie is written with a different unique ID. This cookie is used to determine unique visitors to your site and it is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure both the validity and accessibility of the cookie as an extra security measure.	2 years from set/update.
<code>__utmb</code>	This cookie is used to establish and continue a user session with your site. When a user views a page on your site, the Google Analytics code attempts to update this cookie. If it does not find the cookie, a new one is written and a new session is established. Each time a user visits a different page on your site, this cookie is updated to expire in 30 minutes, thus continuing a single session for as long as user activity continues within 30-minute intervals. This cookie expires when a user pauses on a page on your site for longer than 30 minutes. You can modify the default length of a user session with the setSessionCookieTimeout() method.	30 minutes from set/update.
<code>__utmc</code>	This cookie is no longer used by the <code>ga.js</code> tracking code to determine session status. Historically, this cookie operated in conjunction with the <code>__utmb</code> cookie to determine whether or not to establish a new session for the user. For backwards compatibility purposes with sites still using the <code>urchin.js</code> tracking code, this cookie will continue to be written and will expire when the user exits the browser. However, if you are debugging your site tracking and you use the <code>ga.js</code> tracking code, you should not interpret the existence of this cookie in relation to a new or expired session.	Not set.
<code>__utmz</code>	This cookie stores the type of referral used by the visitor to reach your site, whether via a direct method, a referring link, a website search, or a campaign such as an ad or an email link. It is used to calculate search engine traffic, ad campaigns and page navigation within your own site. The cookie is updated with each page view to your site.	6 months from set/update.
<code>__utmv</code>	This cookie is not normally present in a default configuration of the tracking code. The <code>__utmv</code> cookie passes the information provided via the setVar() method, which you use to create a custom user segment. This string is then passed to the Analytics servers in the GIF request URL via the <code>utmcc</code> parameter. This cookie is only written if you have added the <code>_setVar()</code> method for the tracking code on your website page.	2 years from set/update.

_utmz	This cookie is used by Website Optimizer and only set when the Website Optimizer tracking code is installed and correctly configured for your pages. When the optimizer script executes, this cookie stores the variation this visitor is assigned to for each experiment, so the visitor has a consistent experience on your site.	2 years from set/update.
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Our advertisers/payment services providers may also send you cookies.

Our advertising services providers may send you cookies for the purpose of enabling the service of advertisements based on your previous visits to our website.

We may publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using the DART cookie. You can view, delete or add interest categories associated with your browser using Google's Ads Preference Manager, available at: <http://www.google.com/ads/preferences/>. You can opt-out of the AdSense partner network cookie at: <http://www.google.com/privacy/ads/> or using the NAI's (Network Advertising Initiative's) multi-cookie opt-out mechanism at: http://www.networkadvertising.org/managing/opt_out.asp. However, these opt-out mechanisms use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you should use the Google browser plug-in available at: <http://www.google.com/ads/preferences/plugin>.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites, including this one.

(3) Using your personal information

Personal information submitted to us via this website will be used for the purposes specified in this privacy policy or in relevant parts of the website.

We may use your personal information to:

- (a) administer the website;
- (b) improve your browsing experience by personalising the website;
- (c) enable your use of the services available on the website;
- (d) send to you goods purchased via the website, and supply to you services purchased via the website;
- (e) send statements and invoices to you, and collect payments from you;
- (f) send you general (non-marketing) commercial communications;
- (g) send you email notifications which you have specifically requested;
- (h) send to you our newsletter and other marketing communications relating to our business which we think may be of interest to you by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at

any time if you no longer require marketing communications);

- (i) provide third parties with statistical information about our users – but this information will not be used to identify any individual user;
- (j) deal with enquiries and complaints made by or about you relating to the website;
- (k) keep the website secure and prevent fraud;

Where you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

All our website financial transactions are handled through our payment services provider, PayPal. You can review the PayPal privacy policy at www.paypal.com. We will share information with PayPal only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds

(4) Disclosures

We may disclose information about you to any of our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.

In addition, we may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any legal proceedings or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
- [(d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
- [(e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

Except as provided in this privacy policy, we will not provide your information to third parties.

(5) International data transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

Information which you provide may be transferred to countries including the United States and Japan which do not have data protection laws equivalent to those in force in

the European Economic Area.

In addition, personal information that you submit for publication on the website will be published on the internet and may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

You expressly agree to such transfers of personal information.

(6) Security of your personal information

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password and firewall protected) servers.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to the website).

(7) Policy amendments

We may update this privacy policy from time-to-time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

We may also notify you of changes to our privacy policy by email.

(8) Your rights

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:

- (a) the payment of a fee (currently fixed at £10.00); and
- (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

We may withhold such personal information to the extent permitted by law.

You may instruct us not to process your personal information for marketing purposes, by sending an email to us. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt-out of the use of your personal information for marketing purposes.

(9) Third party websites

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

(10) Updating information

Please let us know if the personal information which we hold about you needs to be

corrected or updated.

(11) Contact

If you have any questions about this privacy policy or our treatment of your personal information, please write to us by email to info@stepping-stones-coaching.co.uk or by post to 15 The Grove, Stoke, Plymouth, Devon, PL3 4AL, United Kingdom.

(12) Data controller

The data controller responsible in respect of the information collected on this website is Stepping Stones Coaching, 15 The Grove, Stoke, Plymouth, Devon, PL3 4AL, United Kingdom