

JA Pathways Ltd
Company Number: 16930625
Registered Office Address: 167-169 Great Portland Street, 5th Floor, London, United Kingdom, W1W 5PF

Customer Privacy Notice

Version 1 (30/12/2025)

Registered name: JA Pathways Ltd

Trading as: Jess Austin

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on data protection principles, definitions, and key terms.

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Contact detail:

If you have any questions about this Privacy Notice, you can contact us by visiting this page on our website:

<https://www.jessaustin.co.uk/contact>

What information we collect, use, and why:

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Date of birth
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health information (including dietary requirements, allergies and health conditions)
- Account information
- Information relating to compliments or complaints

We also collect or use the following special category information to **provide services and goods, including delivery.** This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information for the **operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details

We also collect or use the following special category information to **operation of customer accounts and guarantees**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details
- Marketing preferences
- Recorded images, such as photos or videos
- Purchase or viewing history
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

We also collect or use the following special category information to **comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Call recordings
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety
- Correspondence

We also collect the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights:

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.

- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data:

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Collecting data for reporting health and safety incidents.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from:

- Directly from you

How long we keep information:

We store your personal information for a period of time that is consistent with the business purposes or as long as needed to fulfil and comply with legal obligations. The criteria we used to determine how long we store your personal information will vary depending on several different factors. We typically consider the following when determining data retention:

- The purpose for collecting the personal information in the first place. For example, if you have an active account with us, we need to keep your contact information during the entirety of that time in order to provide you with support or contact you regarding your account;
- The volume, nature, and sensitivity of the personal information we are processing;
- The potential risk of harm from unauthorised use or disclosure of the personal information;
- Whether we can achieve the purposes for processing with less data or through other means
- Legal requirements that may apply to the data

When the data retention period expires for a given type of data, we will delete or destroy it. If, for technical reasons, we are unable to do so, we will implement appropriate security measures to prevent any further use of such data.

Who we share information with:

Data processors:

Google LLC

This data processor does the following activities for us: They collect and store records of customers and attendees.

Apple Distribution International Ltd.

This data processor does the following activities for us: Manage IT systems for email and storage. Collect and store records of customers, attendees and suppliers.

Monzo Bank Limited

This data processor does the following activities for us: Provides banking services. Collects and stores records relating to those who we make payments to and those who make payments to us.

Automattic Inc.

This data processor does the following activities for us: Host our website, including providing anti-SPAM measures. Collects and stores records entered for example email addresses. Stores photos displayed on the website.

Cloudflare, Inc.

This data processor does the following activities for us: Cloudflare Turnstile is a tool to protect web properties by distinguishing human users from bots and blocking any detected bot traffic that could otherwise harm the safety and security of that property. It does so by evaluating a variety of client-side signals ("Signals") such as client IP address, TLS Fingerprint, User-Agent Header and Sitekey and associated origin. The purpose of collecting these Signals is not to identify, profile or target any individuals but solely to detect and block bots. The Signals collected by Turnstile are strictly necessary for this purpose (i.e. detecting and blocking bots to enable visitors to enjoy a safe and secure experience when visiting websites that have implemented Turnstile).

Meta Platforms, Inc.

This data processor does the following activities for us: Social media and advertising. Including publishing and storing previous posts/advertises containing photo and video data.

Tally BV

This data processor does the following activities for us: They collect and store records of customers and attendees.

Stripe, Inc.

This data processor does the following activities for us: Collects payments and stores data relating to payments made by customers.

Xero (UK) Limited

This data processor does the following activities for us: Accounting and financial record keeping software.

Others we share personal information with:

- Insurance companies
- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Relevant regulatory authorities
- Professional consultants
- Emergency services
- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers

Sharing information outside the UK:

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: **Google LLC**

Category of recipient: Technology services

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Organisation name: **Apple Distribution International Ltd.**

Category of recipient: Technology Services

Country the personal information is sent to: Ireland

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: **Automatic Inc.**

Category of recipient: Technology Services

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Organisation name: **Cloudflare, Inc.**

Category of recipient: Technology Services

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law:
The UK Extension EU-U.S. Data Privacy Framework (EU-U.S. DPF)

Organisation name: **Meta Platforms, Inc.**

Category of recipient: Social Media and Advertising.

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA)

Organisation name: **Tally BV**

Category of recipient: Technology Services

Country the personal information is sent to: Belgium

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: **Stripe, Inc.**

Category of recipient: Payment Collection Services

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The International Data Transfer Agreement (IDTA) and The UK Extension EU-U.S. Data Privacy Framework (EU-U.S. DPF)

How to complain:

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>