



PRIVACY POLICY

Be Your True Color

Version: 1.0

Effective Date: November 2024

1. INTRODUCTION

Be Your True Color (hereinafter: "we", "us", or "our") respects your privacy and is committed to protecting your personal data. This privacy policy explains how we collect, use, store, and protect your personal information when you use our website and purchase our online EFT program "The Journey to Your Future".

This privacy policy complies with the General Data Protection Regulation (GDPR) and other applicable privacy laws.

2. CONTROLLER INFORMATION

Be Your True Color

Chamber of Commerce number: 93199066

VAT number: NL866309676B01

Email: info@beyourtruecolor.com

Website: www.beyourtruecolor.com

For questions about this privacy policy or your personal data, you can contact us at info@beyourtruecolor.com.

3. WHAT PERSONAL DATA DO WE COLLECT?

We collect and process the following personal data:

3.1 Information you provide to us:

- **Name** (first and last name)
- **Email address**
- **Payment information** (processed securely through our payment provider)

- **Communication data** (correspondence via email or contact forms)

3.2 Automatically collected information:

- **Technical data:** IP address, browser type, device information
- **Usage data:** pages visited, time spent on website, navigation patterns
- **Cookies:** see section 8 for more information

4. HOW DO WE USE YOUR PERSONAL DATA?

We use your personal data for the following purposes:

4.1 Performance of the agreement:

- Processing your order and payment
- Providing access to the online program
- Sending confirmation emails and login credentials
- Customer service and support
- Technical maintenance of your account

Legal basis: Performance of contract (GDPR Article 6(1)(b))

4.2 Communication:

- Responding to your questions and requests
- Sending important updates about the program
- Providing customer support

Legal basis: Performance of contract (GDPR Article 6(1)(b))

4.3 Marketing (only with your consent):

- Sending newsletters and promotional emails about our products and services
- Informing you about new programs, updates, or special offers

Legal basis: Consent (GDPR Article 6(1)(a))

Note: You can withdraw your consent at any time by clicking the unsubscribe link in our emails or by contacting us at info@beyourtruecolor.com.

4.4 Improvement of services:

- Analyzing website usage to improve user experience
- Developing new features and content

- Ensuring website security and preventing fraud

Legal basis: Legitimate interest (GDPR Article 6(1)(f))

4.5 Legal obligations:

- Complying with tax and accounting requirements
- Responding to legal requests from authorities

Legal basis: Legal obligation (GDPR Article 6(1)(c))

5. HOW LONG DO WE KEEP YOUR DATA?

We retain your personal data for as long as necessary for the purposes described in this privacy policy:

- **Account data:** As long as you have access to the program (lifetime access)
- **Payment data:** 7 years (legal obligation for tax purposes)
- **Marketing communications:** Until you unsubscribe or withdraw consent
- **Technical/usage data:** Maximum 2 years
- **Customer service correspondence:** 3 years after last contact

After these periods, your personal data will be securely deleted or anonymized.

6. WHO DO WE SHARE YOUR DATA WITH?

We do not sell, rent, or trade your personal data to third parties. We only share your data with trusted service providers who help us deliver our services:

6.1 Payment providers:

- **Plug & Pay** (or other payment processors) for secure payment processing
- These providers process payment information according to strict security standards (PCI-DSS)

6.2 Email service providers:

- For sending confirmation emails, program access, and newsletters (if you subscribed)
- Examples: Mailchimp, ActiveCampaign, or similar services

6.3 Hosting providers:

- For storing and delivering the online program content

- Servers are located within the EU/EEA for GDPR compliance

6.4 Analytics providers:

- **Google Analytics** (anonymized) or similar tools for website statistics
- We use privacy-friendly settings and anonymize IP addresses

6.5 Legal obligations:

- We may disclose your data if required by law, court order, or government authority

All third-party service providers are carefully selected and contractually obligated to protect your data according to GDPR standards.

7. INTERNATIONAL DATA TRANSFERS

Your personal data is primarily processed within the European Economic Area (EEA). If data is transferred outside the EEA, we ensure appropriate safeguards are in place:

- **Standard Contractual Clauses** approved by the European Commission
- **Adequacy decisions** for countries with adequate data protection
- **Privacy Shield** (where applicable) or equivalent mechanisms

You can request more information about international transfers by contacting us at info@beyourtruecolor.com.

8. COOKIES

Our website uses cookies to improve your experience and analyze website usage.

8.1 What are cookies?

Cookies are small text files stored on your device when you visit our website.

8.2 Types of cookies we use:

Essential cookies (strictly necessary):

- Enable basic website functions
- Remember your login status
- Cannot be disabled

Analytics cookies (with your consent):

- Track website usage anonymously

- Help us improve user experience
- Examples: Google Analytics (anonymized)

Marketing cookies (with your consent):

- Track your interests for targeted advertising
- Only used if you give explicit consent

8.3 Managing cookies:

You can control and delete cookies through your browser settings. Note that disabling essential cookies may affect website functionality.

For more information about cookies, visit: www.allaboutcookies.org

9. YOUR RIGHTS UNDER GDPR

You have the following rights regarding your personal data:

9.1 Right of access (Article 15)

You can request a copy of all personal data we hold about you.

9.2 Right to rectification (Article 16)

You can request correction of inaccurate or incomplete data.

9.3 Right to erasure / "right to be forgotten" (Article 17)

You can request deletion of your personal data, unless we have a legal obligation to retain it.

9.4 Right to restriction of processing (Article 18)

You can request that we limit how we use your data in certain circumstances.

9.5 Right to data portability (Article 20)

You can request your data in a structured, commonly used format to transfer to another provider.

9.6 Right to object (Article 21)

You can object to processing based on legitimate interests or for direct marketing purposes.

9.7 Right to withdraw consent (Article 7)

You can withdraw your consent at any time for marketing communications or analytics cookies.

9.8 Right to lodge a complaint

You can file a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens):

- Website: www.autoriteitpersoonsgegevens.nl
- Phone: +31 (0)70 888 8500

10. HOW TO EXERCISE YOUR RIGHTS

To exercise any of your rights, please contact us:

Email: info@beyourtruecolor.com

Please include the following in your request:

- Your name and email address
- Clear description of your request
- Proof of identity (copy of ID with BSN number masked)

We will respond to your request within **1 month**. In complex cases, we may extend this period by 2 additional months and will inform you accordingly.

11. DATA SECURITY

We take appropriate technical and organizational measures to protect your personal data against:

- Unauthorized access
- Accidental loss or destruction
- Unlawful processing
- Data breaches

11.1 Security measures include:

- **SSL/TLS encryption** for data transmission
- **Secure password protection** for accounts
- **Regular security updates** and monitoring
- **Access controls** limiting who can access your data
- **Backup systems** to prevent data loss

11.2 Data breach notification:

In the unlikely event of a data breach that poses a risk to your rights and freedoms, we will notify you and the relevant authorities within 72 hours as required by GDPR.

12. CHILDREN'S PRIVACY

Our services are intended for adults (18 years and older). We do not knowingly collect personal data from children under 16 without parental consent.

If you believe we have inadvertently collected data from a child, please contact us immediately at info@beyourtruecolor.com, and we will delete it promptly.

13. CHANGES TO THIS PRIVACY POLICY

We may update this privacy policy from time to time to reflect changes in our practices or legal requirements.

- **Notification:** We will notify you of significant changes via email or a prominent notice on our website
- **Effective date:** Changes become effective 30 days after notification
- **Review:** We recommend reviewing this policy periodically

The current version is always available at: www.beyourtruecolor.com/privacy-policy

14. DISCLAIMER REGARDING EFT PROGRAM

Important notice: The online EFT program "The Journey to Your Future" may involve processing sensitive personal information related to emotional or psychological well-being.

- This information is **never shared** with third parties
- Your privacy and confidentiality are paramount
- The program is for **self-help purposes only** and not a substitute for professional medical or psychological care
- If you have serious mental health concerns, please seek professional help

15. CONTACT INFORMATION

For questions, concerns, or requests regarding this privacy policy or your personal data, please contact us:

Be Your True Color

Email: info@beyourtruecolor.com

Website: www.beyourtruecolor.com

We will respond to your inquiry as soon as possible, typically within 3-5 business days.

Last updated: November 2024

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SUMMARY OF KEY POINTS

- ✓ We collect only necessary personal data (name, email, payment info)
- ✓ Your data is used to deliver the program and improve our services
- ✓ We do not sell your data to third parties
- ✓ You have full rights to access, correct, or delete your data
- ✓ We use industry-standard security measures
- ✓ You can opt out of marketing communications anytime
- ✓ Questions? Contact us at info@beyourtruecolor.com