Privacy Notice

Effective Date: [January 2025]

The Clutch Method ("we," "our," or "us") is a trading name of Dr. Henry Briscoe. We are committed to protecting your privacy. This Privacy Notice explains how we collect, use, and protect your personal data when you interact with our website, services, or communications. We comply with the General Data Protection Regulation (GDPR) and follow guidance from the Information Commissioner's Office (ICO).

1. Who We Are

- Business Name: The Clutch Method (trading name of Dr. Henry Briscoe)
- Contact Information: contact@theclutchmethod.com
 If you have any questions about this notice or how your data is handled, please contact us using the email address above.

2. The Data We Collect

Data You Provide to Us

• **Email Addresses and Messages:** Collected through FormSubmit when you voluntarily provide them (e.g., via contact or newsletter sign-up forms).

Data Automatically Collected

• IP Addresses and Technical Data: Collected by third-party services such as DreamHost and Cloudflare to enable website hosting, manage domain settings, and enhance website security.

3. Children's Privacy Protection

Our services are not designed for or intentionally targeted at children under the age of 13. We do not knowingly collect or maintain data about anyone under this age.

If you believe we have collected data about a child under 13, please contact us immediately at contact@theclutchmethod.com, and we will take appropriate steps to delete it.

4. How We Use Your Data

We process your personal data for the following purposes:

- **To Operate and Maintain Our Website:** DreamHost and Cloudflare collect data to ensure the functionality, security, and performance of our website.
- **To Respond to Your Inquiries:** Email addresses and messages collected via FormSubmit or iCloud are used solely to respond to your requests.
- **To Support Advertising Efforts:** If and when we run Google PPC ads, we may use tracking technologies to analyze ad performance and understand user interactions.

5. Legal Basis for Processing Your Data

Under GDPR, we rely on the following legal bases for processing your data:

- 1. **Performance of a Contract:** To provide and maintain our website and respond to your inquiries.
- 2. **Legitimate Interests:** To improve our website and analyze ad performance.
- 3. **Consent:** For the use of non-essential cookies, such as those related to Google PPC advertising.

6. Sharing Your Data with Third Parties

We work with trusted third-party providers who process your data on our behalf:

- DreamHost: Website hosting services.
- Cloudflare: Domain management and security.
- FormSubmit: Contact form data processing.
- Google Drive: Hosting free downloadable content.
- iCloud: Email communication.

These providers process data in compliance with GDPR. However, their retention practices are subject to their privacy policies.

7. Data Retention

We retain your data only as long as necessary to fulfill the purposes outlined in this notice:

- **Email Addresses and Messages:** Retained until your inquiry is resolved or you request deletion. Newsletter subscriptions are retained until you unsubscribe.
- Hosting and Domain Data: Retained by DreamHost and Cloudflare as part of their operational processes.

Deletion requests will be forwarded to relevant third-party providers where applicable.

8. Your Rights

Under GDPR, you have the following rights regarding your personal data:

- Access: Request a copy of your data.
- Correction: Request corrections to inaccurate or incomplete data.
- **Deletion:** Request the deletion of your data (subject to legal obligations).
- Restriction: Restrict processing under certain conditions.
- Objection: Object to data processing for specific purposes, such as advertising.
- **Data Portability:** Request a copy of your data in a structured, machine-readable format.

To exercise these rights, contact us at contact@theclutchmethod.com.

9. Cookies and Tracking

We may use cookies on our website to:

• Analyze website traffic and performance (Google PPC advertising, if applicable).

You can manage your cookie preferences or opt out of personalized advertising through <u>Google Ads Settings</u>.

10. International Data Transfers

Some of our third-party providers (e.g., Cloudflare, DreamHost, iCloud, Google Drive, and FormSubmit) process data outside the European Economic Area (EEA). These providers use GDPR-approved mechanisms such as Standard Contractual Clauses (SCCs) to ensure your data is adequately protected.

11. Data Security

We take appropriate technical and organizational measures to protect your data. However, as some data is processed by third-party providers, their security practices also apply.

12. Updates to This Privacy Notice

We may update this notice from time to time. Any changes will be posted on this page with an updated effective date.

13. Contact Us

If you have questions or concerns about this privacy notice, please contact us at:

• Email: contact@theclutchmethod.com

Relevant Privacy Policies of Third-Party Providers:

- <u>DreamHost Privacy Policy</u>
- Cloudflare Privacy Policy
- Google Privacy Policy
- Apple Privacy Policy
- FormSubmit Privacy Policy