

PRIVACY POLICY

Egofluisteraar CommV

Version: August 2026

1. Who We Are

Data controller: Egofluisteraar CommV

Represented by: Leyla Naguibova

Registered office: BELGIUM

Enterprise number: 0792.986.381

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Email: contact@leylanaguibova.com

Website: www.leylanaguibova.com

Egofluisteraar CommV (“Egofluisteraar”, “we”, “us” or “our”) is the data controller for the personal data described in this Privacy Policy, unless another party is expressly identified as the controller for a particular processing activity.

2. Scope of This Privacy Policy

This Privacy Policy explains how we collect, use, store, share and protect personal data when you visit our website, contact us, purchase a digital product or program, book a 1:1 session, join a membership or community, attend an online event or session, subscribe to marketing communications, or otherwise interact with Egofluisteraar.

3. Personal Data We May Collect

- **Identity and contact data:** name, email address, telephone number, postal/billing address and other contact details you provide.
- **Transaction and billing data:** products or services purchased, transaction status, invoices, VAT-related information, payment method metadata and payment references. We do not ordinarily receive or store full payment-card details when payments are processed by a payment provider.
- **Booking data:** appointment date and time, booking status, time zone, answers to booking questions and communications relating to a session.
- **Account and membership data:** account identifiers, membership status, access permissions, participation information and information necessary to operate a digital platform or community.
- **Communications:** emails, support requests, form submissions, feedback and other communications you send to us or our team.
- **Program and participation data:** information you choose to provide when participating in a program, community, call, event or session.
- **Marketing data:** newsletter subscription status, marketing preferences, campaign engagement and related consent records where applicable.

- **Technical and usage data:** IP address, device/browser information, log data, website interactions, referral information and cookie or similar-technology data, depending on your choices and the technologies used.
- **Content and media:** where relevant and lawfully collected, recordings, images, testimonials or other content created in connection with a session, event or community.

4. Sensitive Personal Data and Information Shared in Sessions

4.1 Our services are not medical, psychiatric or psychological treatment, and we do not ask you to provide more sensitive personal information than is necessary.

4.2 During a 1:1 session, community interaction, application, email or other communication, you may voluntarily disclose information about your personal life, emotions, experiences or other matters. Please avoid sharing health information or other sensitive personal data unless it is genuinely necessary for the interaction.

4.3 If special-category personal data is nevertheless provided to us, we will only process it where a valid legal basis and, where required, an applicable condition under the GDPR exists. We do not use voluntarily disclosed sensitive information for unrelated advertising or profiling.

5. How We Collect Personal Data

- Directly from you when you purchase, register, book, complete a form, join a community, subscribe, contact us or participate in a service.
- Automatically through our website and digital services, for example through server logs, cookies and similar technologies, subject to applicable consent requirements.
- From service providers involved in your transaction or interaction, such as payment, booking, website, email or community platforms.
- From publicly available sources or social-media interactions where relevant and lawful.

6. Why We Process Your Data and Our Legal Bases

Purpose	Examples	Typical legal basis
Provide products and services	Process purchases, grant access, manage memberships, deliver digital content, organise calls and provide support.	Performance of a contract / steps at your request before entering a contract.
Payments, invoices and administration	Process transaction information, invoicing, bookkeeping, tax and financial administration.	Contract and/or legal obligation.
Bookings and service communications	Confirm appointments, send reminders, reschedule sessions and communicate service information.	Contract and legitimate interests where appropriate.
Customer support and relationship management	Respond to questions, complaints and requests and keep necessary service records.	Contract and/or legitimate interests.

Security and fraud prevention	Protect accounts, investigate misuse, prevent fraud, maintain system security and establish or defend legal claims.	Legitimate interests and, where applicable, legal obligation.
Marketing and newsletters	Send promotional emails, updates and offers.	Consent where required; in limited situations another lawful basis may apply under applicable direct-marketing rules.
Website analytics and non-essential tracking	Measure website use, understand campaigns or improve digital experiences.	Consent where required for cookies/trackers; any subsequent personal-data processing must also have an appropriate GDPR basis.
Legal compliance	Comply with accounting, tax, regulatory, court or lawful authority requirements.	Legal obligation.

Where we rely on legitimate interests, we assess whether our interests are necessary and proportionate and whether your rights and interests override them. Where processing is based on consent, you may withdraw that consent at any time for the future.

7. Payments

Payments may be processed by Stripe or another payment provider identified at checkout. Payment providers process payment and fraud-prevention information under their own contractual and privacy arrangements. Egofluisteraar generally receives transaction confirmations, billing information and payment references rather than full card details.

8. Appointment Scheduling

We may use Calendly or another scheduling provider to manage appointments. When you book, information such as your name, email address, time zone, selected appointment and answers to booking questions may be processed for scheduling and service delivery.

9. Website, Email, Community and Other Service Providers

We use service providers to operate our business. Depending on the services in use, these may include website/hosting providers, payment processors, scheduling tools, email and newsletter providers, community/course platforms, video-call providers, automation tools, accounting/invoicing providers, cloud storage and IT/security providers.

Current important providers should be listed or linked here before publication, for example: Stripe (payments), Calendly (bookings), Mailerlite, Community on Circle, Zoom , Wix, Billit, and Yuki.

10. Who We Share Personal Data With

- Service providers and processors that help us deliver our website, products, bookings, payments, communications, community and administration.

- Professional advisers such as accountants, legal advisers or authorised debt-recovery professionals where necessary.
- Public authorities, regulators, courts or law-enforcement bodies where disclosure is legally required or necessary to protect legal rights.
- A buyer, successor or adviser in connection with a genuine restructuring, merger, sale or transfer of all or part of the business, subject to appropriate safeguards.

We do not sell personal data.

11. International Data Transfers

Some service providers may process or make personal data accessible outside Belgium or the European Economic Area (EEA). Where personal data is transferred to a country outside the EEA, we use a lawful transfer mechanism where required, such as an adequacy decision, the European Commission's Standard Contractual Clauses, or another mechanism permitted by data-protection law. Where relevant, supplementary safeguards may also be applied. You may contact us for further information about the safeguards applicable to a particular transfer.

12. How Long We Keep Personal Data

We keep personal data only for as long as reasonably necessary for the purpose for which it was collected, including contractual, accounting, tax, evidentiary and legal requirements. Retention can therefore differ by category. Before publication, the periods below should be checked against your actual systems and Belgian legal obligations.

- **Customer, purchase and contractual records:** up to 10 years where necessary for contractual administration, legal claims or compliance with legal obligations.
- **Invoices and accounting records:** 10 years in accordance with applicable Belgian legal requirements.
- **Bookings, memberships and customer communications:** generally up to 2 years after the end of the service or interaction, unless the information needs to be retained longer for contractual, accounting or legal reasons.
- **Newsletter and marketing data:** until you unsubscribe or withdraw your consent. We may keep minimal information afterwards to ensure we respect your opt-out.
- **Consent records:** for as long as reasonably necessary to demonstrate compliance with our legal obligations.
- **Cookies and similar technologies:** according to the retention periods described in our Cookie Policy.

13. Marketing Communications

13.1 Where required, we send newsletters and promotional communications only after obtaining valid consent.

13.2 Marketing consent is separate from acceptance of our General Terms & Conditions and is not required to purchase a product or book a service unless the communication is strictly necessary to provide that service.

13.3 You may unsubscribe at any time using the unsubscribe link in a marketing email or by contacting us. Withdrawal of consent does not affect processing that was lawful before withdrawal.

13.4 We may retain minimal information necessary to record that you opted out so that we do not inadvertently add you back to marketing.

14. Cookies and Similar Technologies

14.1 Our website may use cookies, pixels, local storage and similar technologies. Strictly necessary technologies may be used where they are required to operate the website or provide a service you expressly request.

14.2 Non-essential cookies and trackers - including analytics, advertising or social-media tracking where used - will only be activated where the legally required prior consent has been obtained.

14.3 Cookie consent must be freely given, specific, informed, active and capable of being withdrawn. Continuing to browse, accepting General Terms or using a pre-ticked box is not treated as valid consent for non-essential cookies.

14.4 Our separate Cookie Policy and cookie-consent interface should identify the cookies/trackers actually used, their purposes, providers and lifespans, and allow you to change or withdraw your choices.

14.5 [VERIFY BEFORE PUBLICATION: identify whether Google Analytics, Meta Pixel, social-media plugins or other analytics/advertising technologies are currently installed and ensure they are blocked until valid consent where required.]

15. Security

We take appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. No internet or storage system can be guaranteed to be completely secure, but we review safeguards appropriate to the nature of the data and risks involved.

16. Your Data Protection Rights

- **Access:** ask whether we process your personal data and request access to it.
- **Rectification:** ask us to correct inaccurate or incomplete personal data.
- **Erasure:** ask us to delete personal data where the legal conditions are met.
- **Restriction:** ask us to restrict processing in certain circumstances.
- **Data portability:** receive certain personal data in a structured, commonly used and machine-readable format and, where applicable, have it transmitted to another controller.
- **Object:** object to certain processing based on legitimate interests and object at any time to processing for direct marketing.
- **Withdraw consent:** withdraw consent at any time where processing is based on consent, without affecting prior lawful processing.
- **Automated decisions:** where applicable, exercise rights relating to decisions based solely on automated processing that produce legal or similarly significant effects.

To exercise a right, contact us at team@leylanaguibova.com. We may request reasonable information to verify your identity before acting on a request. Rights are subject to the conditions and exceptions provided by applicable law.

17. Complaints to the Supervisory Authority

If you believe your personal data has been processed unlawfully, you have the right to lodge a complaint with a competent data-protection supervisory authority. In Belgium, the supervisory authority is the Belgian Data Protection Authority (Gegevensbeschermingsautoriteit / Autorité de protection des données). You may also contact us first so we can try to resolve your concern.

18. Children

Our products and services are not intentionally directed to children unless a particular offer expressly states otherwise. If we learn that personal data relating to a child has been collected in circumstances requiring parental or guardian authorisation and that authorisation was not validly obtained, we will take appropriate steps in accordance with applicable law.

19. Recordings, Testimonials and Promotional Use

19.1 Participation in a paid service does not by itself give Egofluisteraar permission to use your identifiable image, voice, testimonial, private message or session content for advertising.

19.2 Where we wish to use identifiable customer content for promotional purposes and consent is the appropriate legal basis, we will request separate, specific permission. You may withdraw consent for future use, subject to applicable law and any material already lawfully published or otherwise governed by a different lawful basis.

19.3 If a group session is recorded for members or participants, we will inform participants and apply the appropriate legal basis and safeguards.

20. Community Privacy

When you join a community, other members may be able to see information you choose to place in your profile or share in community spaces. You should only share information you are comfortable sharing with the relevant group. Community members are subject to applicable community rules, but Egofluisteraar cannot guarantee that another participant will never misuse information. Please report privacy or conduct concerns to us promptly.

21. Automated Decision-Making and Profiling

We do not use solely automated decision-making that produces legal or similarly significant effects for our customers. Some of our marketing and analytics tools may measure engagement or group users based on their interactions with our website, emails or content, subject to applicable privacy and consent requirements.

22. Links and Third-Party Services

Our website or communications may contain links to third-party websites or services. Their processing of personal data is governed by their own privacy information. We encourage you to review the relevant privacy notices when interacting directly with a third-party service.

23. Changes to This Privacy Policy

We may update this Privacy Policy when our processing activities, providers or legal obligations change. The current version will be published on our website with an updated effective date. Where a change materially affects how we process personal data, we will provide additional notice where appropriate.

24. Contact

For privacy questions or to exercise your data-protection rights, contact:

Egofluisteraar CommV

Attn: Privacy

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2990 Wuustwel Belgie

Email: contact@leylanaguibova.com

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