

Privacy Policy

Effective Date: July 2025

This privacy policy applies to the processing of personal data on the website www.johanna-froese.com and has been created in accordance with the General Data Protection Regulation (EU GDPR) and the UK General Data Protection Regulation (UK GDPR).

1. Name and Contact of the Controller

Johanna Froese

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Spain

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2. General Principles of Data Processing

We are committed to protecting your personal data. We only collect and process personal data in accordance with the principles of data minimisation, transparency, purpose limitation, and data security.

Personal data means any information that relates to an identified or identifiable natural person (e.g. name, email address, IP address).

We process your data for specific purposes, including:

- Providing and improving our website
- Managing newsletter subscriptions
- Handling appointment bookings

- Analyzing website traffic and marketing performance
- Complying with legal obligations

3. Legal Basis for Processing

According to Article 6 of the EU GDPR and the UK GDPR, we process personal data based on one or more of the following legal bases:

- Your consent (Art. 6(1)(a) GDPR / UK GDPR)
- The performance of a contract or pre-contractual measures (Art. 6(1)(b))
- Compliance with legal obligations (Art. 6(1)(c))
- Our legitimate interests (Art. 6(1)(f)), e.g. ensuring the security and functionality of the website

4. Data Collection on This Website

a) Server Log Files

When you visit our website, your browser automatically transmits the following data to our server (hosted by ALL-INKL.COM, Germany):

- IP address
- Date and time of access
- Browser type and version
- Operating system
- Referrer URL
- Pages visited

This data is stored for security reasons and to ensure the stability of the website. The data is not combined with other data sources.

Legal basis: Art. 6(1)(f) GDPR (legitimate interest in website security)

b) Newsletter (MailerLite)

If you subscribe to our newsletter, we collect your email address and name. We use a double opt-in procedure to confirm your subscription.

Your data is stored and processed by MailerLite, an EU-based email marketing service.

Legal basis: Your consent (Art. 6(1)(a) GDPR)

You can withdraw your consent at any time via the unsubscribe link in each email.

c) Typeform Quiz

We use Typeform to create interactive quizzes. When you submit your answers, your responses and IP address may be recorded by Typeform (based in Spain).

Legal basis: Your consent (Art. 6(1)(a) GDPR)

d) Appointment Booking (Calendly / YouCanBook.Me)

If you book a call via our website, you will be redirected to Calendly or YouCanBook.Me. These tools may collect your name, email address, time zone, and other scheduling details.

Legal basis: Art. 6(1)(b) GDPR (performance of a contract)

e) Embedded Videos (Vimeo)

We embed videos using Vimeo. When you play a video, data such as your IP address and browser info may be sent to Vimeo.

We use privacy-enhanced mode, where possible.

Legal basis: Your consent via cookie banner (Art. 6(1)(a) GDPR)

f) Zoom (for online sessions or calls)

If you book a coaching session or consultation, we may use Zoom for video communication. Zoom may collect personal data such as your name, email address, and session metadata.

Legal basis: Art. 6(1)(b) GDPR (contract performance)

5. Tracking & Analytics

a) Google Analytics (GA4)

We use Google Analytics 4 to analyze website traffic. Google may process data such as your IP address, location, and user behavior. We use IP anonymization and have disabled data sharing options.

Provider: Google Ireland Limited / Google LLC (USA)

Legal basis: Your consent (Art. 6(1)(a) GDPR)

b) Meta Pixel

We use Meta Pixel (Facebook Pixel) to measure the effectiveness of our ads and track visitor actions on our site.

Legal basis: Your consent (Art. 6(1)(a) GDPR)

c) Meta Conversion API

We may also use Meta's Conversion API to send data directly from our server to Meta to improve ad performance and measurement.

Legal basis: Your consent (Art. 6(1)(a) GDPR)

6. Cookies

We use Complianz as a cookie consent management tool.

When you visit our site, a banner informs you about the use of cookies and allows you to manage your preferences.

We use cookies for:

- Essential website functions

- Analytics and statistics
- Marketing and remarketing

You can adjust or withdraw your consent at any time by clicking the cookie icon on our website.

7. Data Transfers to Third Countries

Some tools (e.g. Google, Meta, Calendly) may transfer data to countries outside the EU/UK, such as the USA.

We ensure that all providers offer appropriate safeguards, such as:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Data processing agreements

8. Data Retention

We store your personal data only as long as necessary for the purposes mentioned above or as required by law.

After that, data will be securely deleted or anonymized.

9. Your Rights (under EU & UK GDPR)

You have the following rights regarding your personal data:

- Right of access (Art. 15)
- Right to rectification (Art. 16)
- Right to erasure (Art. 17)
- Right to restriction of processing (Art. 18)
- Right to data portability (Art. 20)
- Right to object (Art. 21)
- Right to withdraw consent at any time (Art. 7(3))

- Right to lodge a complaint with a supervisory authority (Art. 77)

If you are located in the UK, your supervisory authority is the Information Commissioner's Office (ICO).

10. Data Security

We use industry-standard SSL encryption and take technical and organizational measures to protect your personal data from unauthorized access, loss, or misuse.

11. Changes to This Policy

We may update this policy occasionally to reflect legal or technical changes. The latest version is always available on this website.

Contact for Privacy Concerns

If you have questions about this privacy policy or wish to exercise your rights, please contact:

Johanna Froese

Email: johanna.h.froese@gmail.com