



GINKGO & CEDAR LTD

trading as The Menopause Ascent Method™

PRIVACY NOTICE

Applies to: visitors to menopauseascent.com; staff of client organisations using Base Camp and Climbers Clubhouse; business clients contacts; Leaders workshop attendees; Personal coaching applicants and clients; and anyone who contacts us. It explains what personal data we collect, why, how long we keep it, and your rights under UK data protection law.

Effective date: [insert date] | Version: 01.0

1. Who We Are

In this notice, the following words have the following meanings:

- “Company”, “we”, “us” or “our” means Ginkgo & Cedar Ltd, a company registered in England and Wales under company number 17319032, whose registered office is at 54 Littledown Avenue, Bournemouth, United Kingdom, BH7 7AR, trading as The Menopause Ascent Method™.
- “Client” means a business, organisation or other entity that has ordered our Services, as defined in our Terms and Conditions.
- “Services” means the Teams package, the Leaders package and the Personal package, including the Base Camp online training, Climbers Clubhouse, the Leaders workshop and one-to-one coaching.
- “you” or “your” means the individual whose personal data we process, whether you are a website visitor, a learner, a Client contact, a coaching client or an enquirer.
- “Data protection law” means the UK GDPR, the Data Protection Act 2018 (as amended by the Data (Use and Access) Act 2025) and the Privacy and Electronic Communications Regulations 2003 (“PECR”).

We are registered with the Information Commissioner’s Office (“ICO”) under registration number [insert ICO registration number]. We are not required to appoint a Data Protection Officer. Our data protection lead is Lynn Jackson-Taylor, Director, who can be contacted using the details at the end of this notice.

2. Our Role: Controller and Processor

For most of the personal data described in this notice, we are the **controller**: we decide why and how your data is used, and we are responsible for it under data protection law.

Where a Client enrolls its staff on Base Camp, the position is shared. We act as a **processor** on the Client’s behalf for the staff list the Client gives us (names and work email addresses used to grant access) and for any completion reporting we provide to the Client. For those activities we follow the Client’s written instructions, and the Client’s own privacy notice also applies to you. We act as an independent **controller** for operating, securing and improving the Base Camp platform, and for evaluating the effectiveness of our training using anonymised or aggregated data.

If you are a staff learner and have questions about how your employer uses your training records, please contact your employer in the first instance. We will help them respond.



3. The Personal Data We Collect

Business Clients and their contacts

Name, job title, organisation, work email address, telephone number, billing address, purchase order details, correspondence, and records of Orders, invoices and payments. We do not store payment card details; card payments are handled by our payment provider [insert provider, e.g. Stripe].

Base Camp learners (Teams and Leaders packages)

Name, work email address, organisation, login credentials (passwords are stored in encrypted, hashed form by our authentication provider and are never visible to us), module progress, quiz attempts and scores, responses to the pre- and post-learning surveys, and the details printed on your Menopause Awareness Certificate (name and completion date).

Climbers Clubhouse users

Account details, content accessed, and any information you choose to share with us when requesting enhanced one-to-one support.

Leaders workshop attendees

Name, job title, attendance record, and any dietary or access requirements you tell us about so that we can make reasonable arrangements for the session.

Personal coaching applicants and clients

Contact details, the information you provide in your application (such as your role, professional background and goals), scheduling and payment records, session notes, and any information about your health and wellbeing that you choose to share with us during coaching.

Enquirers and anyone who contacts us

Name, contact details and the content of your enquiry or correspondence, including support requests sent by email.

Website visitors

Technical information such as IP address, browser type, device information and pages visited, collected by our hosting provider in server logs, and information stored on your device to keep you logged in (see Section 13).

Marketing contacts

Name, email address and your marketing preferences, where you have signed up to hear from us or we are otherwise permitted to contact you. [Delete this item if no newsletter or marketing emails are sent.]

4. Health Information

Menopause is a health matter, and information about your health is “special category data” under data protection law, which receives extra protection. We handle it as follows:

- **Teams and Leaders packages:** the training does not require you to tell us anything about your own health. The pre- and post-learning surveys measure your knowledge and confidence, not



your health status. Please do not include personal health details in survey responses or quiz answers. [Confirm that no survey question asks about personal symptoms or menopausal status.]

- **Climbers Clubhouse and enhanced support:** we do not record whether any user is menopausal, and using the Clubhouse is not treated as an indication of health status. If you choose to tell us about your health when requesting one-to-one support, we will use that information only to respond to you, on the basis of your explicit consent.
- **Workshop access requirements:** where an access requirement reveals health information, we use it only to make arrangements for the session, on the basis of your explicit consent, and delete it after the event.
- **Personal coaching:** we process health information you share on the basis of your explicit consent, which we ask for before coaching begins. You may withdraw consent at any time, although we may then be unable to continue coaching.

We will never share information about your individual health with your employer or any Client without your explicit consent, unless we are required to do so by law or there is a serious risk of harm to you or others.

5. How We Collect Your Data

- **Directly from you**, when you place an Order, create a Base Camp account, complete modules and surveys, apply for coaching, attend a workshop or contact us.
- **From your employer**, where a Client provides your name and work email address so that you can be given access to Base Camp (our approved-email list).
- **Automatically**, when you use our website and platform, through server logs and the browser storage described in Section 13.

6. Why We Use Your Data and Our Lawful Basis

Data protection law requires us to have a lawful basis for each use of your personal data. The table below sets out our purposes and the basis we rely on.

Purpose	Whose data	Lawful basis
Taking and fulfilling Orders, invoicing and managing our relationship with Clients	Client contacts	Contract (where you are a sole trader or the contracting party); otherwise legitimate interests in running our business
Creating Base Camp accounts, unlocking modules, recording progress and issuing certificates	Learners	Legitimate interests (ours and the Client's) in delivering the training the Client has purchased; for the staff list, we act on the Client's instructions
Reporting completion to the Client [confirm: individual completion status, or aggregate figures only]	Learners	Legitimate interests of the Client in evidencing staff training
Evaluating and improving our training using pre- and post-learning survey results	Learners	Legitimate interests in measuring and improving the quality of our Services; results are reported to Clients in aggregated or anonymised form only



Purpose	Whose data	Lawful basis
Providing Climbers Clubhouse and responding to support requests	Learners, enquirers	Legitimate interests; explicit consent for any health information you choose to share
Organising and delivering Leaders workshops	Attendees	Legitimate interests in delivering the Client's Order; explicit consent for access requirements
Assessing applications for, and delivering, Personal coaching	Coaching applicants and clients	Steps before entering a contract, then contract; explicit consent for health information
Responding to enquiries and correspondence	Enquirers	Legitimate interests in responding to you
Keeping our website and platform secure, maintaining access controls and preventing misuse	All users	Legitimate interests in operating a secure service
Keeping accounting and tax records and meeting other legal obligations	Client contacts, coaching clients	Legal obligation
Sending marketing emails	Marketing contacts	Consent for individuals; for contacts at businesses, legitimate interests, with an unsubscribe option in every email
Establishing, exercising or defending legal claims	All	Legitimate interests

Where we rely on legitimate interests, we have considered your interests and rights and concluded that they are not overridden. You can ask us for more detail about this assessment. Where we rely on consent, you can withdraw it at any time by contacting us.

7. Automated Decisions

Base Camp automatically unlocks each module once you score at least 80% on the previous module's quiz. This is an automated process, but it does not produce legal or similarly significant effects: you can retake a quiz as many times as you need, and you can contact us at any time for help. We do not use your data for profiling or any other automated decision-making.

8. Who We Share Your Data With

We do not sell your personal data. We share it only where necessary, with:

- **Service providers** who process data on our behalf under contract: Supabase (authentication, database and file storage for Base Camp); Netlify (website hosting); Google (email and, through embedded YouTube videos, video delivery); [insert payment provider]; and [insert any other providers, e.g. accountancy software, scheduling or video-call tools used for coaching].
- **Your employer**, if you are a staff learner, as described in Sections 2 and 6. We do not share survey responses or health information with your employer in a form that identifies you.



- **Professional advisers**, such as our accountants, lawyers and insurers, under duties of confidentiality.
- **Regulators, law enforcement or courts**, where we are required to do so by law.
- **A successor to our business**, if the business is sold or restructured, in which case this notice will continue to apply to your data.

9. International Transfers

Some of our service providers are based in, or may access data from, countries outside the UK, including the United States. Where this happens, we make sure the transfer is protected by one of the safeguards recognised under UK data protection law, such as the UK Extension to the EU–US Data Privacy Framework (the “UK–US data bridge”) for certified providers, or the ICO’s International Data Transfer Agreement or Addendum. Our Base Camp database is hosted in [insert Supabase region, e.g. London (eu-west-2) or Frankfurt (eu-central-1)]. You can contact us for more information about the safeguards we use.

10. How Long We Keep Your Data

We keep personal data only for as long as we need it for the purposes described above, including to meet legal, accounting and reporting requirements. When the period below ends, we securely delete the data or anonymise it so that you can no longer be identified.

Type of data	Retention period	Reason
Contract and Order records, including correspondence with Clients	6 years after the end of the Contract	Limitation period for contract claims (Limitation Act 1980)
Invoices, payment and accounting records	6 years from the end of the financial year to which they relate	HMRC requirements and the Companies Act 2006
Base Camp account, progress and quiz data	While the Client’s access remains current, then deleted within 12 months of access ending, or sooner on the Client’s written request	To deliver the training and allow the Client to evidence completion
Certificate records (name, organisation, completion date)	6 years from the date of issue	To verify or reissue certificates and respond to legal claims
Pre- and post-learning survey responses	Identifiable responses deleted with the Base Camp account; anonymised, aggregated results kept indefinitely	Evaluating the effectiveness of our training
Climbers Clubhouse access and support correspondence	Duration of access plus 12 months	To provide support and handle follow-up queries
Workshop attendance records	As part of the Contract record (6 years)	Evidence of Services delivered
Workshop dietary and access requirements	Deleted within 1 month after the event	No longer needed once the event has taken place



Type of data	Retention period	Reason
Personal coaching applications that do not proceed	6 months from the date of decision	To respond to any follow-up questions
Personal coaching records, including session notes	6 years after the end of the coaching relationship	Limitation period for legal claims and professional accountability
General enquiries that do not lead to an Order	12 months from last contact	To respond to follow-up questions
Marketing preferences	Until you unsubscribe; we then keep your email address on a suppression list so that we do not contact you again	Respecting your choice
Data protection complaints and rights requests	3 years after the matter is closed	Evidencing how we handled your request or complaint
Website server logs	As set by our hosting provider, typically no more than [30] days	Security and troubleshooting

We may keep data for longer where we are required to do so by law, or where it is needed in connection with an actual or anticipated legal claim.

11. How We Keep Your Data Secure

We use appropriate technical and organisational measures to protect your data, including encrypted (HTTPS) connections, encrypted password storage, access to Base Camp restricted to approved email addresses, database access rules that limit each user to their own records, strong authentication on our administrator accounts, and access to personal data limited to those who need it. [Confirm that row-level security is enabled on all Supabase tables containing personal data.]

If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will report it to the ICO within 72 hours of becoming aware of it and, where the risk is high, we will tell you without undue delay. Where we act as a processor, we will notify the relevant Client without undue delay.

12. Your Rights

Under data protection law you have the following rights, subject to certain conditions and exemptions:

- **Access:** to ask for a copy of the personal data we hold about you.
- **Rectification:** to ask us to correct data that is inaccurate or incomplete.
- **Erasure:** to ask us to delete your data where there is no good reason for us to keep it.
- **Restriction:** to ask us to pause the use of your data, for example while we check its accuracy.
- **Objection:** to object to our use of your data where we rely on legitimate interests, and to object at any time to direct marketing.
- **Portability:** to receive data you have provided to us in a structured, commonly used format, or to have it sent to another organisation, where processing is based on consent or contract and carried out by automated means.



- **Withdrawal of consent:** where we rely on your consent, to withdraw it at any time. This does not affect processing already carried out.

To exercise any of these rights, contact us using the details below. We will respond within one month of receiving your request, which may be extended by up to two further months for complex requests; we will tell you if this applies. We will usually not charge a fee. We may need to confirm your identity before responding, and our searches will be reasonable and proportionate. Where your request concerns data we process on a Client's behalf, we will pass it to the Client promptly and help them to respond.

13. Cookies and Similar Technologies

Our website uses browser storage that is strictly necessary to keep you securely logged in to Base Camp and Climbers Clubhouse. Because it is essential to the service you have asked for, it does not require your consent under PECR.

Our training videos are embedded from YouTube. [We use YouTube's privacy-enhanced mode, which does not set cookies until you play a video / delete as applicable.] When you play a video, Google may collect information in line with its own privacy policy.

We do not use analytics or advertising cookies. [If analytics or other non-essential cookies are added, update this section and introduce a consent banner before they are placed.]

14. Children

Our Services are designed for adults in the workplace and are not directed at anyone under 18. We do not knowingly collect personal data from children.

15. Complaints

If you are unhappy with how we have handled your personal data, please contact us first so that we can put it right. You can raise a complaint by email or in writing using the details below, or by any other means. We will acknowledge your complaint within 30 days, investigate it, keep you informed of progress, and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority for data protection:

- Website: ico.org.uk/make-a-complaint
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16. Changes to This Notice

We keep this notice under review and will update it when our Services or data practices change. The current version will always be available on our website, and the effective date and version number at the top of this notice show when it was last updated. Where changes are significant, we will tell Clients and account holders directly.



Contact

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