Privacy Policy – 4AhealthyU

Last updated: 23 November 2026

This privacy policy explains how I, Romany Shiny Manuel, collect and use your personal data through 4AhealthyU. It applies when you visit my website, sign up for my emails, book a call, buy a digital product, or take part in one of my coaching programmes.

I handle your personal data in line with the General Data Protection Regulation (GDPR, in Dutch: AVG), the Dutch GDPR Implementation Act (Uitvoeringswet AVG) and the Dutch Telecommunications Act (Telecommunicatiewet), which sets the rules for cookies and marketing emails.

1. Who I am

4AhealthyU is the trade name of my business. I am the data controller for the personal data described in this policy, which means I decide how and why it is used.

- **Business name:** 4AhealthyU, owned by Romany Shiny Manuel
- **Chamber of Commerce (KvK) number:** 98617044
- **Email:** support@romanymanuel.com
- **Website:** https://romanymanuel.com

I am a small, one-person business, so I have not appointed a Data Protection Officer. You can contact me directly with any question about your data.

2. What personal data I collect

I only collect the data I need for the purposes described in section 4.

- **Contact details:** your name, email address and, if you give it, your phone number or country of residence.
- **Booking details:** the information you give when you book a Clarity & Connection Call or another appointment, such as your preferred time and what you would like to talk about.
- **Payment and billing details:** your billing name and address, what you bought, the amount and the date. Payments are handled by an external payment provider; I do not receive or store your full card or bank details.
- **Account details:** for online programmes or memberships, your login name and account activity. Your password is stored by the platform in encrypted form; I cannot see it.

- **Coaching information:** what you share with me before and during coaching, such as your goals, lifestyle, training history, intake forms, progress notes and messages.
- **Communication:** emails and messages you send me, and your replies to surveys or questionnaires.
- **Technical data:** your IP address, browser and device type, and how you use my website, collected through cookies or similar technology (see section 9).

You are not legally required to give me your personal data. Some details are needed to provide a service, though: without your name, email address and billing details I cannot take your booking, deliver your purchase or invoice you. Sharing health information is always your choice.

3. Health information you share with me

In coaching you may tell me about your health, for example menopausal symptoms, sleep, energy, injuries, medical conditions or medication. Under the GDPR this is health data, a special category of personal data that needs extra protection.

- I only process health information with your **explicit consent**, which I ask for separately, for example in my intake form, before coaching starts.
- I use it only to tailor my coaching to you. I do not use it for marketing and I do not share it with anyone without your permission, unless the law requires me to.
- You decide what you share. You can withdraw your consent at any time by emailing me. This does not affect what I did with your data before you withdrew it, but it may mean I can no longer coach you in the same way.

My coaching is not medical care, and I am not a medical professional. For medical questions I will always refer you to your GP or another healthcare provider.

4. Why I use your data and on what legal basis

The GDPR only allows me to use your data when there is a legal basis for it. The table shows each purpose and the basis I rely on.

Purpose	Data used	Legal basis (GDPR)
Answering your questions and messages	Contact details, communication	Legitimate interest in responding to you (art. 6(1)(f)), or taking steps before a contract at your request (art. 6(1)(b))

Purpose	Data used	Legal basis (GDPR)
Booking and holding calls	Contact and booking details	Taking steps before a contract at your request (art. 6(1)(b))
Delivering coaching, programmes and digital products, and giving you access	Contact, account and coaching information	Performance of a contract (art. 6(1)(b))
Tailoring coaching to your health	Health information	Your explicit consent (art. 9(2) (a))
Processing payments and keeping my accounts	Payment and billing details	Performance of a contract (art. 6(1)(b)) and legal obligation (art. 6(1)(c))
Sending my newsletter and offers	Name, email address	Your consent (art. 6(1)(a)), or for existing clients my legitimate interest within the limits of the Telecommunications Act (see section 5)
Understanding and improving my website	Technical data	Legitimate interest (art. 6(1) (f)): only functional cookies and privacy-friendly statistics (see section 9)
Meeting legal duties, such as tax record-keeping	Billing and transaction details	Legal obligation (art. 6(1)(c))

Where I rely on legitimate interest, I have weighed my interest against your privacy. You can object to this at any time (see section 12).

5. Emails and newsletter

I only send you my newsletter or promotional emails if you have signed up and confirmed your subscription.

If you have bought a product or service from me, I may also email you about similar products or services of my own. The Dutch Telecommunications Act allows this, provided you can opt out at any time.

Every email contains an unsubscribe link. You can also email me to stop receiving them. Unsubscribing does not affect emails I need to send you about a purchase or programme you are taking part in.

6. Who I share your data with

I do not sell, rent or trade your personal data. I share it only where it is needed to run my business, with:

- **Service providers (processors):** companies that work on my behalf, such as my website host, email and newsletter platform, online course or membership platform, booking tool, video-call tool and payment provider. I have data processing agreements with them, so they may only use your data on my instructions and must keep it secure. Current providers: Namecheap (website hosting), MailerLite (email and newsletter), ThriveCart (checkout) and Everfit (coaching platform).
- **Bank and payment providers:** ABN AMRO and the payment providers connected to my checkout, such as Stripe or PayPal, handle payments under their own responsibility and their own privacy policies.
- **My accountant:** for bookkeeping and tax returns, limited to billing and transaction details.
- **Authorities:** when the law requires it, for example the Dutch Tax Administration (Belastingdienst), or a court order.

I only share your health information with another person, such as your doctor, if you ask me to and give your explicit consent.

7. Transfers outside the EEA

Some of my service providers are based outside the European Economic Area (EEA), or store data there, for example in the United States. I only work with such providers when your data is protected to the standard the GDPR requires. This means at least one of the following applies:

- the European Commission has decided that the country offers an adequate level of protection (an adequacy decision, which for the United States covers companies certified under the EU–US Data Privacy Framework); or
- the provider has signed the European Commission's Standard Contractual Clauses.

You can email me for more information about these safeguards.

8. How long I keep your data

I keep your data no longer than I need it for the purpose I collected it for, or than the law requires.

Data	How long I keep it
Invoices, payments and other financial records	7 years, as required by Dutch tax law
Coaching information, including health information	Up to 3 years after our last coaching contact, so I can support you if you return, unless you ask me to delete it sooner
Account details for programmes and memberships	As long as you have access, and up to 6 months after your access ends
Newsletter subscription	Until you unsubscribe
Emails and enquiries that did not lead to a booking	Up to 1 year after our last contact

After these periods I delete your data or make it anonymous.

9. Cookies and analytics

Cookies are small files stored on your device when you visit a website. My website uses two kinds:

- **Functional cookies:** needed for the website to work, for example to remember your cookie choice or keep you logged in. These do not need your consent.
- **Analytical cookies:** help me see how visitors use my website, such as which pages are read most. If they are set up in a privacy-friendly way, with little impact on your privacy, Dutch law does not require consent. Any other analytical cookies are only placed with your consent.

I do not use tracking or marketing cookies. Because I only use cookies that do not need your consent, you will not see a cookie banner. If I ever start using cookies that do need your consent, I will update this policy and ask for your consent first.

You can delete or block cookies in your browser settings. Blocking some cookies may affect how parts of the website work.

For questions about privacy or the use of cookies on romanymanuel.com, please contact support@romanymanuel.com.

10. Security

I take appropriate technical and organisational measures to protect your data against loss and unauthorised access. These include working with reputable providers, a secure (HTTPS) website connection, password protection and two-step verification on my accounts, and limiting access to your data to myself and the providers listed in section 6.

No online system is completely secure. If a data breach happens that is likely to put your rights at risk, I will report it to the Dutch Data Protection Authority and, where required, inform you.

11. Automated decision-making

I do not make decisions about you based solely on automated processing, such as profiling, that have legal or similarly significant effects for you.

12. Your rights and how to complain

Under the GDPR you have the right to:

- **Access** the personal data I hold about you and receive a copy.
- **Rectification** of data that is incorrect or incomplete.
- **Erasure** of your data, unless I am legally required to keep it, such as financial records.
- **Restriction** of the use of your data, for example while we check whether it is correct.
- **Data portability:** receive the data you gave me in a structured, commonly used format, or have it sent to another provider.
- **Object** to my use of your data based on legitimate interest, and to direct marketing at any time.
- **Withdraw your consent** at any time, where I rely on it.

To use any of these rights, email me at support@romanymanuel.com. I may ask you to confirm your identity first, so I do not share your data with the wrong person. I will respond within one month. If your request is complex, I may extend this by up to two months and will tell you why.

If you are unhappy with how I handle your data, please contact me first so I can try to put it right. You also have the right to lodge a complaint with the Dutch Data Protection Authority, the Autoriteit Persoonsgegevens, or with the data protection authority in the EU country where you live or work.

13. Age

My services are intended for adults aged 18 and over. I do not knowingly collect personal data from anyone under 18. If you believe someone under 18 has shared their data with me, please let me know and I will delete it.

14. Changes to this policy

I may update this privacy policy when my services, the tools I use or the law change. The latest version is always on this page, with the date at the top. If a change significantly affects how I use your data, I will let you know by email or on my website.

15. Contact

For any question about this policy or your personal data, contact me at:

Romany Shiny Manuel – 4AhealthyU

Email: support@romanymanuel.com

KvK: 98617044