

## Your Data, our Responsibility

1. **Mission.** Our mission is to develop effective organisations with motivated members that prevent people problems. To do that, we seek to form a partnership with our clients and develop tailored solutions to for their people. This will be based on information/data that you share with us. However, we recognise that we are merely custodians, and not owners, of your data. We only use that information where we have a proper legal basis for doing so. our Mission<sup>1</sup> can be summarised as –

### *Developing Effective Organisations – Preventing People Problems*

2. **Policy Aim.** This policy will help you understand that how we use the information we collect and how you have a choice over how we use it.
3. **Background.** Originally a Face2Face business with mentoring/coaching support either in person or by telephone and e-mail coaching/mentoring capability, we now are expanding into:
  - 3.1. E-learning which can be accessed by the learner without, or with, support;
  - 3.2. Tailored, One2One, Coaching and Mentoring sessions;
  - 3.3. Webinars that can be generic in nature or tailored to client needs.
4. **Questions.** We welcome questions on our privacy policy.

### **Information (Data) Collection**

5. **General.** We collect your information (or data) using a number of different channels. This section sets out those channels.
6. **Consent.** When you give consent to us or give us permission to obtain it from another source.
7. **Contractual.** When we initially discuss your service requirements with you prior to signing a contract or when you have signed that contract for our services. You will voluntarily share personal data relevant to the conduct of the service contract or the task/s that you request we undertake. This can include, but is not restricted to:
  - 7.1. Your name;
  - 7.2. Email and/or IP Address;
  - 7.3. Business and/or Home Address;
  - 7.4. Contact telephone numbers;
  - 7.5. Date of Birth;
  - 7.6. Opinions and/or comments;
  - 7.7. Gender, Age;

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<sup>1</sup> This is registered, as part of our Trademark, with the Intellectual Property Office (IPO).

7.8. Health, Disability & Dietary requirements;

7.9. We will explain other data, if relevant, in connection with service delivery.

**8. Using our website.** When you use our website and its applications or learning programmes, certain Internet and electronic network activity information gets created and logged automatically. Examples of the data collected are:

**8.1. Log data.** our systems record information (“log data”), including information that your browser automatically sends whenever you visit our website. This log data can include:

8.1.1. Your Internet Protocol address (which we use to verify your identity);

8.1.2. The dates and length of time that you use our website or its programmes;

8.1.3. Cookie data and device data.

**8.2. Cookie data.** We also use “cookies” (small text files sent by your computer each time you visit our website, unique to your account or your browser) or similar technologies to get log data. When we use cookies or other similar technologies, we use session cookies (that last until you close your browser) or persistent cookies (that last until you or your browser delete them). For example, we use cookies to store your preferences or other settings so you don’t have to set them up every time you visit the our website. Some of the cookies we use are associated with your account (including data about you, such as the email address you gave us, passwords or verification codes) and other cookies are not. For more detailed information about how we use cookies, please read on:

8.2.1. Essential cookies are required so that our website works in the way you expect. Examples of these types of cookies are login cookies which keep you logged in as you scroll through our website or its associated programmes.

8.2.2. Analytics cookies, which are used for internal analytics and include cookies from providers like [Google Analytics](#).

8.2.3. Personalisation cookies for customising content, including ads, presented to you on our website.

8.2.4. Marketing cookies which are used for advertising our website content to you outside our website.

**8.3. Device information.** In addition to log data, we may collect information about the device you’re using our website on, including the type of device, operating system, settings, unique device identifiers and crash data that helps us understand when something breaks.

**8.4. Clickstream data and inferences.** When you’re on our website, we use your activity to deliver our services mores effectively e.g:

8.4.1. the pages you click on;

8.4.2. the selections you make; and

8.4.3. any text you add in a comment, quiz answer or description;

## What we do with the info we collect

9. We're committed to showing you content that's relevant to you/your business. To do that, we use your information to provide and improve your experience, including:
  - 9.1. Identify you when you use our website.
  - 9.2. Respond to your enquiries, questions or comments.
10. We have a legitimate interest for using your info in these ways. It's fundamental to providing the necessary services to you/your business through our website: in some cases, it is necessary to providing you with tailored programmes.
11. We also have a legitimate interest in making our website safe, and improving our product features, so you keep finding the inspiration you want. We all benefit when we use your information to:
  - 11.1. Work with law enforcement and keep our website safe. We may get requests for account information from law enforcement, for example, the police or courts.
  - 11.2. Conduct analytics and research on who is using our website and what they are doing e.g. by logging how often people use our website and the individual pages.
  - 11.3. Improve our website and offer new features.
  - 11.4. Send you updates on new programmes related to programmes you have already accessed. You can choose to stop getting these notifications by sending an email to us.
12. We have a legitimate interest in delivering ads that are relevant and interesting in order to generate revenue, reducing the cost of our programmes to you/your business.
13. We'll also rely on your consent where we use cookies to:
  - 13.1. Identify you across different browser sessions. This means if you log in to our website from your phone (or any device), we'll remember that you're you and then you won't need to enter your login details each time you visit our website.
  - 13.2. Show you information you might be interested in.

## Transferring your information

14. Our website is a worldwide service. We will encrypt any information and whenever possible we use servers to back up your information located within the UK or EEA.
15. If you have any questions about our data processing activities, the data controller you should contact is ChambersConsulting (info@chambersconsulting.co.uk), 101 Avonbrook Gardens, Coleraine BT52 1NS, which is registered with the ICO. You can also contact our [Data Protection Officer](#) using the above contact details.
16. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the ICO or with your local supervisory authority.
17. We will only transfer the personal data of EEA residents outside the UK/EEA where you give your explicit consent or on receipt of a legally constituted order by a UK Court.
18. Where we transfer information from the EEA to a country that doesn't provide an adequate level of protection, we'll only do so under appropriate safeguards put in place to protect your information, such as standard contractual clauses or Privacy Shield certification.

## Choices you have about your info

19. As we stated at the beginning of this policy our philosophy on data protection is:

### Your Data, our Responsibility

20. Our aim is to inform you of, and comply with, your choices on your personal data, within legal constraints. We try to design these into our website and the training that our team experience. For example, you can:

- 20.1. Advise of changes in your personal data at any time and we undertake to update it within a reasonable period;
- 20.2. Provide you with any personal data that hold within 30 days, once you have verified your identity;
- 20.3. Restrict processing to that necessary to deliver the services you have contracted for;
- 20.4. Retain only information necessary to meet our legal and contractual obligations;
- 20.5. Close your account on your instruction subject to legal, and contractual, obligations with legal enforcement agencies and our insurers.

21. You also have choices available to you through the device or software you use to access our website. For example:

- 21.1. The browser you use lets you control cookies or other types of local data storage.
- 21.2. Your mobile device lets you choose what personal data is shared with us with subject to delivery of the contracted services.

22. To learn more about these choices, please see the information provided by your device or software provider.

## How and when we share information

23. We will only share your personal data with those service providers you authorise us to do in order to deliver the contracted services that you have requested.

- 23.1. Online advertisers and third-party companies that we or they use to audit or improve the delivery and performance of ads or content on our websites and apps (for example, through Google Analytics). This includes us sharing the ads you were shown on our website and whether or how you engaged with those ads, or other information about your activity on our website.
- 23.2. law enforcement agencies or government agencies. We only share information if we believe that disclosure is reasonably necessary to comply with a law, regulation or legal request; to protect the safety, rights or property of the public, any person or our website; or to detect, prevent or otherwise address fraud, security or technical issues.

## How long we keep your information for

24. We only keep your information for as long as we need it to provide our website to you and fulfil the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need

to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalise it so that we can't identify you.

### **Young people**

25. Children under 13 are not allowed to use our website as this is the minimum age that they have legal consent in UK. If you are based in the EEA, you may only use our website if you are over the age at which you can provide consent to data processing under the laws of your country. If you are a parent and you learn that your child is using our website and you don't want them to, please contact us (see paragraph 15).

### **Your options**

26. You have options in relation to the information that we have about you. To exercise these options, please contact us:

26.1. Request access to the information we collect and hold about you. We'll usually share this with you within 30 days of you requesting this and providing suitable forms of identity (Current passport/photo-identity and two forms of proof of identity from the following list:

26.1.1. Utility Bills;

26.1.2. Bank/Credit Card statements;

26.1.3. Voter registration (with address);

26.1.4. Telecommunications/Satellite provider.

26.2. Have your information corrected or deleted. You can update your information on your profile or delete your data by closing your account (paragraph 20.5) subject to your account being settled and production of verification of identity (paragraph 27.1).

26.3. Object to us processing your information. You can ask us to stop using your information, including when we use your information to send you marketing emails or push notifications. If you opt out of receiving marketing messages from us, we may still send you updates about your account e.g. outstanding invoices.

26.4. Have the information you provided to us sent to another organisation, where we hold this information with your consent or for the performance of a contract with you, and, where it's technically feasible for us to do so.

26.5. Request more details about the information we collect and how and why we use and share it.

27. We will not discriminate against you if you choose to exercise your options related to your personal data. We will be transparent about your options and the consequences of exercising certain options on service delivery.

### **Residents of the EEA**

28. If you have any questions about our data processing activities, the data controller you should contact our DPO: address at paragraph 15.

29. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the ICO or with your local supervisory authority.

30. Please read the information in paragraphs 14-18 related to transfers of data outside EEA/UK.
31. Where we transfer information from the EEA to a country that doesn't provide an adequate level of protection, we'll only do so under appropriate safeguards put in place to protect your information, such as standard contractual clauses or Privacy Shield certification.

#### **California Residents**

32. The California Consumer Privacy Act (CCPA) requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above.
33. In the preceding twelve months, we have collected Personal Information from you, your devices, our partners, third parties and from categories of sources otherwise described in this privacy policy.
34. We are also required to communicate information about rights California residents have under California law. You may exercise the following rights:
  - 34.1. Right to know and access. You may submit a verifiable request for information regarding the: (1) categories of Personal Information we collect, use or share; (2) purposes for which categories of Personal Information are collected or used by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you.
  - 34.2. Right to equal service. We will not discriminate against you if you exercise your privacy rights.
  - 34.3. Right to delete. You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.
35. We do not sell the Personal Information of our users.
36. For more information about these rights, please contact us and provide verification (requirements at paragraph 27.1).
37. We collect the following categories of Personal Information and in the preceding 12 months, we have disclosed these categories of Personal Information for a business purpose to affiliates, service providers and third parties only when absolutely necessary to obtain certification:
  - 37.1. Identifiers, such as your name, username, email address, phone number, unique device identifiers and your IP address
  - 37.2. Personal characteristics protected by law, such as your gender and age
  - 37.3. Commercial information, such as purchases made, and payment information
  - 37.4. Internet or electronic network activity information, such as information about your device and your use of our Services
  - 37.5. Geo-location data, when shared through your device settings or photos
  - 37.6. Electronic, visual or similar information

38. We use and disclose this information for the business purposes described in this policy, including to: audit our Service, detect security incidents and prevent fraud, debug and repair errors, maintain your account, provide customer service, process or fulfil orders, conduct research and development and other activities to improve our Service, show advertising, market our Services, and understand how users interact with our Services.

#### **How we make changes to this policy**

39. We may change this policy from time to time. If we do, we'll post any changes on this page. If you continue to use our website after the changes come into effect, you agree to the new policy. If the changes are significant, we may provide a more prominent notice or get your consent, as required by law.

#### **Contact us**

40. The best way to get in touch with us or to exercise your options described above is through paragraph 15.

Effective date: 20 April 2020

