

## **PRIVACY POLICY**

### **ABOUT US:**

We understand that your privacy is important to you and we respect and value the privacy of everyone who visits our [website](#), and our clients. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under Data Protection Law.

Our Site is owned by Leadership Through Data, a Limited company registered in England

**Company number:** 11087569.

**Registered address:** 68 Haselmere Close, Bury St Edmunds, Suffolk, IP32 7JQ.

**Postal Address:** Lodge House, Lodge Park, lodge Lane, Langham, Colchester, CO4 5NE

**Telephone number:** 01206 807267

**VAT number:** 284261104.

We are registered as a data controller with the Information Commissioners Office (ICO), our registration number is **AE236497**.

Our business is to provide training and consultancy to our clients on areas of Information Governance, Data Protection and investigations. We will not sell or trade your personal data in other way.

Our legal basis for processing personal data under GDPR is:

Article 6(1)(b) – Contract

Article 6(1)(f) – Legitimate interests

Article 6(1)(a) - Consent

### **USING OUR WEBSITE**

Our web hosting provider will keep logs of connections to our website which is monitored so we are able to prevent and detect suspicious activity. The logs will contain your IP address which can identify your location data, the duration you have spent on the site, the movement around the site and the browser (such as Chrome, firefox) that you are using. We do not use this data for any other purposes other than to identify any suspicious activity on the site. If detected the connection will be blocked. This information is kept for 3 months unless there is an ongoing investigation then this will be stored until the investigation has ceased.

We do this to protect you as the user, and us, to ensure our site is secure and working efficiently. The processing of personal data is done on the basis of legitimate interests. You have the right to object to the processing, we will review the request and make an assessment balanced against the security and function of the site if processing was to stop.

On our site we have a 'contact us form' this is used for you to make an enquiry with us. The data is sent automatically using Mailgun which sends the data from our site to our email address ([info@leadershipthroughdata.co.uk](mailto:info@leadershipthroughdata.co.uk)). Mailgun stores the messages on their server for 72 hours before deleting them. We use a contact us form so that we can respond to enquiries quickly and with ease for you. cv

We also ask if you want to be added to our mailing list with a tick box option under our contact form. If you opt in, we will receive this information from mailgun. You can unsubscribe at any time by contacting us on our email [info@leadershipthroughdata.co.uk](mailto:info@leadershipthroughdata.co.uk) or in the subject header of an email simply reply 'unsubscribe' and we will remove you. If you do not tick the box on the contact form you will not be added to the mailing list, but we will of course respond to your enquiry.

### **Third parties**

The website is managed by an external developer, who is based in the UK. They have a data processing contract with us which is compliant with Data Protection Laws

### **Email**

If you email us directly we will use the data you have supplied to respond to your message. We will keep these messages that we have exchanged, which will be stored on our Customer Relations Management System (CRM). Our CRM system is Salesforce, and their servers are in the UK.

### **Cookies**

There are currently no tracking cookies on this site, however we do use Google Analytics which is an analytics platform. This does not store your IP address, but will cover the following:

- The content you access
- The type of device, system and browser you're using
- The pages you view, in what order and for how long
- Clicks on links within the site

This enables us to understand how our site is used, which in turn, enables us to improve our site and the services offered through it.

The analytics service(s) used by our site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First Party	Google Analytics	Used to distinguish users for Analytics data

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## WHAT IS PERSONAL DATA?

Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## WHAT ARE MY RIGHTS?

Under Data Protection Law you have the following rights, which we will always work to uphold:

- a) The right to be **informed** about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions by emailing [info@leadershipthroughdata.co.uk](mailto:info@leadershipthroughdata.co.uk) or calling 01206 807267.
- b) The right to **access** the personal data we hold about you commonly known as 'Subject Access Request or SAR's' You have the right to ask us:
  - If we are processing your personal data

- The reason for processing
- The lawful basis
- Categories of personal data about you which we are processing
- If your data is being sent outside the EEA
- The Data Controllers your data has been passed to, the purpose and lawful basis
- How long your data is kept for
- A copy of the data processed

b.1) We have a form for this request, email [info@leadershipthroughdata.co.uk](mailto:info@leadershipthroughdata.co.uk) and we will respond back to you, with the form to be completed. Completing this form helps us to identify and manage request consistently. Or you can our office call 01206 807267 and make a request.

b.2) There is not normally any charge for a subject access request, however if your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

b.3) We will respond to your subject access request within **1 calendar month**. You will be kept fully informed of our progress.

- c) The right to have your personal data **rectified** if any of your personal data held by us is inaccurate or out of date, please contact us as soon as possible.
- d) The right to be **forgotten** i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. This only applies certain circumstances:
- Consent has been withdrawn and there is no further legal basis to continue processing
  - There is a law that requires the data to be deleted or the processing is unlawful
  - The processing is no longer necessary
  - Your objection to our processing under legitimate interest outweighs those interests
- e) The right to **restrict** (i.e. prevent) the processing of your personal data.

- i In some circumstances you can limit, restrict the amount of personal data used by us, If:
  - ii It was inaccurate
  - iii Processing is unlawful
  - iv No longer necessary for the original purpose, however might need to be kept for legal purposes.
  - v Right to object to processing
- f) The right to **object** to us using your personal data for a purpose or purposes, for example for direct marketing. If you ask us to stop processing, we will remove you immediately. We will keep a do not contact list to comply with this right and ensure you are not contacted in future.
- i You can object to any processing of your personal data based on legitimate interest. This will be based on the original balance test that was completed. for us to rely on legitimate interest. When we receive an objection, we will revisit the balance test, decisions on whether we should cease processing, would be based on a case by case basis.
- g) The right to data **portability**. This means that, you can ask for personal data processed by us, via the means of a computer which has been provided based on legitimate interests, consent or necessary to fulfil a contract requirement. We will provide this information directly to you or to the new data controller.
- h) Rights relating to **automated** decision-making and profiling. We do not use your personal data in this way.

## WHAT DATA DO WE COLLECT?

Depending upon your use of our site, and to provide our services to you we may collect some or all of the following personal data:

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;

- Job title;
- Profession;
- Financial details;

### **HOW DO WE USE IT?**

- Deliver a contract to provide training or consultancy service to you
- Personalising and tailoring our services for you.
- Contact you in relation to your booking or attendance at our training courses
- Keep you informed of forthcoming training courses.
- Communicating with you. This may include responding to emails or calls from you
- Providing delegate lists to course attendees
- Supplying you with information by email that you have opted-in to (you may unsubscribe or opt-out at any time by emailing or telephoning us)
- Analysing your use of our site and gathering feedback to enable us to continually improve our site and your user experience
- We do not disclose your booking data to any other parties without your consent

### **HOW LONG WILL YOU KEEP MY PERSONAL DATA?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for 6 years from your last contact with us.

### **DO YOU TRANSFER MY PERSONAL DATA OVERSEAS?**

We do not transfer or process data outside the EEA unless we have your specific consent or where the nature of the processing requires us to do so; such as you have chosen to use communication services which routes data outside the EEA. The security of your personal data is essential to us and to protect your data, we take a number of important measures, including the following:

- Secure file Sharing Platform
- Cloud Based office 365
- Firewall and Anti-Virus software

## **DO YOU SHARE MY PERSONAL DATA?**

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## **COMPLAINT**

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the [Information Commissioner's Office](#).

## **CHANGES TO THIS PRIVACY POLICY**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our site.

**Last Reviewed 29/09/18**