

PRIVACY AND COOKIE NOTICE

We need to process some personal data in order to provide our training courses and consultancy. This privacy notice outlines what we do, how we do it, what we use it for and why use it.

A LITTLE BIT ABOUT US

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.

Telephone number: 01206 807267

VAT number: 284261104.

We are registered as a data controller with the Information Commissioners Office (ICO), our registration number is ZA303412.

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

WHAT PERSONAL DATA TO WE PROCESS?

Type of data	Processing Condition (Article 6 and Article 9 if required)	Purpose	Retention Period
Booking forms and contact details and invoices.	Contract	To book delegates onto our courses	Last action/entry plus 6 years
Enquiries (including those by social media)	Consent	To answer any queries and provide booking links to our booking forms.	Last action/entry plus 1 year
IRMS Details	Contract	We contact IRMS if the delegate states they are a member in order to validate membership and apply training discount.	Last action/entry plus 6 years

Allergens information	Contract; Health and Safety	We ask for any allergens information in order to provide a meal for courses in which lunch is provided to ensure individual needs are met.	Last action/entry plus 6 years
Unsuccessful Competition entries	Consent	We regularly run competitions to win free training courses in which we ask people to opt into joining our mailing list. In order to win, you do not need to opt in but we like it if you do so that you can hear about future training courses.	Competition ends, any users who opted in to the mailing list are added, opt outs or nil response are destroyed.
Marketing Mailing List & Newsletter	Consent	During competitions and course feedback, we 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 or from our paper forms. You can unsubscribe at any time by contacting us on our email 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 our marketing mailing list.	Last action plus 3 years, reviewed regularly. Delegates may unsubscribe and delete their name at any time.
IP Address, Location Data, Duration on the site, movement around the site and the browser used.	Legitimate Interests	To identify any suspicious activity on the site. If detected the connection will be blocked. This data is held by our developer and is not passed to Leadership Through Data team for any other reason.	Last action/entry plus 3 months
Contact us website form (Mailgun)	Consent	When someone submits a contact form through our website, Mailgun sends the data from our site to our email address	Last action/entry plus 72 hours
Training Feedback forms	Consent	This form is handed out in delegate packs to enable us to take feedback on trainers performance and course satisfaction. This form can be submitted without delegates information but we do request where possible that we can use company name and job title on our website along with any feedback	Last action/entry plus 6 years

		quotes and if they are happy with this, to supply the information.	
Training Delegate Lists	Contract	This form is provided by the trainer for a signature from the delegate to confirm their attendance at the training course as part of the contract and booking onto the course.	Last action/entry plus 6 years
Live Chat on our website	Consent	When someone contacts us via the chat box (Livezilla) on our website, the data is anonymised from the guest (unless the guest includes their name and email address) and sent to a ticketing system in LiveZilla. All information sent is stored on our server in the UK. Please see cookies used by LiveZilla in the table below.	Last action/entry 30 days
Photographs	Consent	From time to time we may take photographs during our training sessions for use on social media, website and marketing material. We will ask all people in the photograph at the time of taking the photograph if they are happy to have their photograph taken and will only proceed with consent. If delegates who have had their photograph taken would like it removed from any platform, where possible we will do so and in a timely manner.	Last action/entry plus 5 year

Third parties

- The website is managed by an external developer, who is based in the UK. They have a contract with us which covers the data they process on our behalf.
- We use an external marketing company, who is based in the UK to conduct Search Engine Optimisation. They do not process any personal data on our behalf.
- All our trainers are self-employed but we have a contract in place with them for the processing of any data.
- We hire venues across England and Wales to provide the training courses. We will share allergen information that could result in you being identified when collecting a meal, however, we do not pass on any names for this purpose. We are sometimes required to share the training delegate list to some of the venues for the purpose of

health and safety reasons. These venues may also have their own methods of collecting data such as signing in books and CCTV for the prevention and detection of crime. Please note we have no control over this information, and you must contact the individual venue when exercising any of your rights.

- YouTube host our videos which are embedded onto our website. Please see the cookies below for YouTube.

Cookies

Our website offers the functionality for you to turn off all cookies except those that keep the website running. If you turn them off, you will not be able to use some of the functionality such as the live chat, however, we are still available on email.

The tracking cookies used by our site use(s) are as follows:

Name of Cookie	First / Third Party	Provider	Purpose
_ga	First Party	Google Analytics	<p>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.</p> <p>To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout</p> <p>Please note that we have no control over how your data is collected, stored, or used by websites other than our own and we advise you to check the privacy policies of any such websites before providing any data to them.</p> <p>We are looking to upgrade our site tracking in order to ensure we collect as limited personal data as possible. This upgrade will include the removal of Google Analytics to Matamo as soon as possible to remove Google's interference with our site, please bear with us during this time.</p>

_GID	First Party	Google Analytics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
_GAT_GTAG	First Party	Google Analytics	Used by Google Analytics to throttle request rate
_gac	First Party	Google Ads	Contains campaign related information for the user. For our linked Google Analytics and Google Ads Accounts, Google Ads website conversion tags will read this cookie unless the user opts-out.
Remarketing Tag	First Party	Google Remarketing	Used to tailor marketing to existing users. See also IDE.
moove_gdpr_popup	First Party	Leadershipthroughdata.co.uk	This cookie is simply used to allow a user to suppress the displaying of the cookie information notice on each page of the web site.
PHPSESSID	First Party	Leadershipthroughdata.co.uk	To store a simple message when a form is submitted that can be displayed on a different page. For example, if an enquiry form is completed incorrectly, a message will be stored and presented to the user to indicate the errors in the submission. When an enquiry form is submitted successfully, a message is stored and presented to the user thanking them for their enquiry. No personal information is stored in this cookie.
GPS	Third Party	Youtube.com	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.
PREF	Third Party	Youtube.com	Registers a unique ID that is used by Google to keep statistics of how the visitor uses YouTube videos across different websites.
VISITOR_INFO1_LIVE	Third Party	Youtube.com	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.
YSC	Third Party	Youtube.com	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.
IDE	Third Party	Youtube.com	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.

lz_geo_city	First Party	LiveZilla.net	Geolocation (City), used to determine the geographical location of website visitors.
lz_geo_ctryiso	First Party	LiveZilla.net	Geolocation (Country), used to determine the geographical location of website visitors.
lz_geo_data	First Party	LiveZilla.net	Geolocation (Timestamp), used to determine the geographical location of website visitors.
lz_geo_lat	First Party	LiveZilla.net	Geolocation (Latitude), used to determine the geographical location of website visitors.
lz_geo_long	First Party	LiveZilla.net	Geolocation (Longitude), used to determine the geographical location of website visitors.
lz_geo_region	First Party	LiveZilla.net	Geolocation (Region), used to determine the geographical location of website visitors.
lz_geo_tz	First Party	LiveZilla.net	Geolocation (Timezone), used to determine the geographical location of website visitors.
lz_last_visit	First Party	LiveZilla.net	Last Visit (Timestamp), used to determine when the website visitor browsed the website the last time.
lz_userid	First Party	LiveZilla.net	Sets up a unique ID which is used to generate statistical data about the website visitor's usage of the website.
lz_visits	First Party	LiveZilla.net	Number of visits which is used to identify how often the website visitor already visited the website.

WHAT ARE MY RIGHTS?

Your rights are:

- a right of access to your personal data held by Leadership Through Data.
- a right to rectify any personal data held by Leadership Through Data that you believe is incorrect
- a right to erase any personal data that Leadership Through Data no longer has a legitimate purpose to process
- a right of access to a machine-readable version of your data, as long as you have provided it or Leadership Through Data has observed it via your use of our services. This is legally only applicable to data provided with your consent or under a contract, but we will endeavour to give you a portable version of any of your data, where possible.
- a right to stop Leadership Through Data processing any of your data that it does not have a legal or contractual obligation to process

- a right to prevent any wholly automated decisions involving your data – Leadership Through Data does not use wholly automated decision-making techniques.

You can exercise any of these rights by contacting us on dpo@leadershipthroughdata.co.uk

DO YOU TRANSFER MY PERSONAL DATA OVERSEAS?

We do not transfer or process data outside the EEA. To the best of our knowledge, all information we have created is stored within the UK.

DO YOU SHARE MY PERSONAL DATA?

In some limited circumstances, we will be legally required to share certain personal data. This includes if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority such as HMRC.

DO YOU HAVE A DATA PROTECTION OFFICER?

The contact for any Data Protection queries is dpo@leadershipthroughdata.co.uk

COMPLAINT

If you have any cause for complaint about our use of your personal data that you feel we cannot rectify by contacting us on the above email address, 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.

LAST REVIEWED

9th October 2019

VERSION CONTROL

Version	Revision Date	Action taken
5.0	9 th October 2019	Amend to reflect Google Ads marketing. Change DPO contact email address.
4.0	11 th March 2019	Added in new processing of personal data for mailing list / newsletter and photographs for marketing plus confirmation for cookies turning off website functionality such as live chat.



3.0	25th February 2019	Streamlined for transparency
2.0	29 th September 2018	Updated to reflect GDPR16 / DPA18
1.0	13 th December 2017	Created