

## Privacy Policy and GDPR Statement

### In a nutshell

Our privacy policy has been updated to reflect the requirements of the General Data Protection Regulation which comes into force on 25<sup>th</sup> May 2018. GDPR gives you more rights over the way organisations use your data – but it is very complex.

This summary is provided in the spirit of communicating in plain English. It does not replace or supersede the content of our formal policy below.

1. If you are a client we sometimes need to get personal and other kinds of data from you for the purposes of doing business with you and providing our services to you. Occasionally we will need to share it with partner organisations where they are providing part of the service. In the language of GDPR we hold this data under the label “legitimate interests”.
2. If you are someone we would like to work with we may keep your details so we can contact you about our services. We need your permission to contact you for this reason and you can ask us to stop at any time. In the language of GDPR we hold this data under the label “consent”.
3. If you are an Associate we need to keep, process and share your profile data so we can match your skills to opportunities. As this process is a core to the PrimeCoach Associate model works you are assumed to have provided consent for us to use the data for this purpose when you provide it. However, in the language of GDPR we hold this data under the label “legitimate interests”.
4. We will use processes, systems and good practice to protect your data from hackers and others. We will never sell your personal data.
5. GDPR gives you a number of rights around your data, including the right to see the data we hold, and – subject to some limits – the right to ask for data to be deleted. See section 8 below for more detail.
6. Unless otherwise agreed with you, we will hold your data for up to two years after we last hear from you, unless we are required to do so for legal or auditing purposes.
7. We use ‘cookies’ on our website to see how people use the site and to keep a record of whether you are happy to accept cookies. Although it is possible to link analytical data with individual ISPs we do not do so in practice.
8. If you have any comments, questions or concerns about this policy or how we store, process and use data please contact Rosalie Millard-Evans [hello@primecoach.uk](mailto:hello@primecoach.uk)

## Our Privacy and Cookies Policy

Last updated 29 April 2018

### 1. Introduction

1.1 PrimeCoach Ltd [henceforth 'We'] is committed to safeguarding the privacy of our website visitors, our associates and service users; in this policy we explain how we will handle your personal data.

1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

1.3 When you submit details via our website or do business with us you will be asked for information which affects how we will process your personal data. You can specify whether you would like to receive direct marketing communications. You can opt out of receiving marketing communications with us at any point by clicking the unsubscribe link in our marketing emails or by emailing us directly at [info@PrimeCoach.com](mailto:info@PrimeCoach.com)

### 2. Credit

2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

### 3. How we use your personal data

3.1 In this Section 3 we have set out:

- (a) the general categories of personal data that we may process;
- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is Google Analytics, a widely used analytics platform. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

3.3 We may process your account data ("**account data**"). Account data may include your name and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.4 In the case of **Associates**, we may process your information included in your personal profile on our website ("**profile data**"). The profile data may include your name, address, telephone number, email

address, profile pictures, gender, date of birth, your professional biography and CV, your skills and experience, availability and associated information required to match you with opportunities. The profile data may be processed and shared with clients or potential clients for the purposes of matching your skills and experience to client needs and securing business opportunities. The legal basis for this processing is our legitimate interests, namely the operation of our associate model which requires us to share profile data with clients. In addition, by providing and updating your profile you are providing consent for us to use that information as described above.

3.5 In the case of Business Partners, we may store and process your data including contact details, transactions, specifications and contracts. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our business.

3.6 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include contact details, invoicing and account details, and specifications. The source of the service data is you or your employer. The service data may be processed for the purposes of providing our services, ensuring the security of our services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

3.7 We may process information contained in any enquiry you submit to us regarding research reports, products and/or services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent.

3.8 We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our business.

3.9 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent. You can unsubscribe at any point by emailing [hello@primecoach.uk](mailto:hello@primecoach.uk) or by clicking the unsubscribe link in the email.

3.10 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

3.11 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with

communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

3.12 We may process any of your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.13 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.14 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

4.3 We may disclose contact details and information about your consignment for the reason of providing our services to you and for communicating with you before, during and after the event.

4.4 In the case of **Associates** we may disclose information from your profile to clients without notice for the purposes of matching your skills to relevant opportunities and securing work for the business and for you. By providing information for your profile you are assumed to have done so for this purpose.

4.5 Financial transactions are recorded on Sage. We will hold transaction data with our services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at <https://uk.sageone.com/privacy-policy/>

4.7 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4.8 We will not sell, loan or share your personal data to other organisations for the purposes of marketing their services unless you ask us to do so.

#### **5. Retaining and deleting personal data**

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain and delete your personal data as follows:

1. Usage data will be retained indefinitely for the purpose of monitoring the historical performance of our website, however personal data beyond the ISP will not be linked to this data.
2. Account data will be retained for a further two years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.
3. Service data will be retained for a further two years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.
4. Associate profile data will be deleted on request or within two years of your last communication with us, after which it will be deleted unless required for auditing or legal reasons.
5. Enquiry data will be deleted on request or within two years of your last communication with us, after which it will be deleted unless required for auditing or legal reasons.
6. Transaction data will be retained for a further two years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.
7. Notification data will be retained for a further two years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.
8. Correspondence data will be retained for a further two years after our last transaction with you, after which it will be deleted unless required for auditing or legal reasons.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the period we need to access the data for the provision of services, receiving payment, resolving insurance or other issues or any other auditing or legal reasons.

5.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Amendments**

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

- a. We may notify you of changes to this policy by email.

## **7. Your rights**

7.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;

- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can ask for your personal data by emailing [hello@primecoach.uk](mailto:hello@primecoach.uk)

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by emailing [hello@primecoach.uk](mailto:hello@primecoach.uk)

## 8. About cookies

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 9. Cookies that we use

9.1 We use cookies for the following purposes:

1. When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

## 10. Cookies used by our service providers

10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website and how we might improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## **11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

## **12. Our details**

12.1 This website is owned and operated by PrimeCoach Ltd

12.2 We are registered in England and Wales under registration number 04437485 and our registered office is at 48 Lyndhurst Ave, Surbiton, Surrey. KT59LL

12.4 You can contact us:

(a) By post, using the postal address PrimeCoach Ltd, 48 Lyndhurst Ave, Surbiton, Surrey. KT59LL

(b) By using our website contact form

(c) By telephone, on 0333 939 0155

or

(d) by email, using the email address [hello@primecoach.uk](mailto:hello@primecoach.uk)

## **13. Data protection officer**

13.1 Our data protection officer's contact details are: Rosalie Millard-Evans Email [hello@primecoach.uk](mailto:hello@primecoach.uk)