

LINDSAY WITTENBERG LTD PRIVACY POLICY

As a provider of a professional service, your privacy and client confidentiality are very important to us. To ensure we comply with the data protection laws, we want to make you aware of how we will collect and use your information.

We are committed to ensuring the security and protection of the personal information that we hold and process, and to providing a compliant and consistent approach to data protection.

We refer in this document to the term 'data processing'. Processing covers a wide range of operations performed on personal data, including by manual or automated means. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by sharing with third parties, dissemination or otherwise making available, restriction, erasure or destruction of personal data.

1. HOW WE USE YOUR INFORMATION AT LINDSAY WITTENBERG LTD

- We will only collect and use information when the law allows us to, where it is necessary to do so and relevant to providing our services to you, and where processing is necessary in order for us to comply with a legal requirement.
- Your contact details, and details of services we deliver to you, as provided by you or your business sponsor or purchaser, are kept in our records to provide our services to you, for billing purposes, to schedule meetings and to send you seasonal greetings.
- These are the ways we may use your personal data:
 - To register you as a new client

- To deliver services to you
 - To carry out administration in connection with the delivery of services to you, including:
 - managing payments, fees and charges
 - collecting and recovering money owed to Lindsay Wittenberg Ltd
 - To manage queries relating to services we or any of our partner coaches have delivered to you historically
 - To manage our relationship with you, which will include notifying you about changes to our terms or privacy policy
-
- Our partner coaches are members of professional bodies, including the Association for Coaching, the EMCC (European Mentoring and Coaching Council), the ICF (International Coach Federation) and APECS (Association of Professional and Executive Coaches and Supervisors), and we abide by the Global Code of Ethics, to which these bodies are signatories. As part of upholding professional qualifications, we are required to maintain client records. As part of this, your name, company and email address are held on file.
 - Coaching clients: All our conversations with you (whether verbal or by e-mail) are totally confidential except, as we agree under our Working Relationship contract, that we may wish to share particular moments in your coaching programme with our own supervisors or coaches for the purpose of improving our practice. These professionals are bound by confidentiality, and we protect your anonymity by never using your full name or contact details in our interactions with them.
 - Coaching clients, prospective clients and those with whom we are discussing, or have discussed, the provision of our services: We may send you information from time to time, to include Lindsay Wittenberg Ltd alumni and learning events, thought leadership articles, updates, or any other materials related to your coaching programme.

2. OUR PARTNER COACHES

- Any session notes that are kept by Lindsay Wittenberg Ltd partner coaches are kept by them individually. You can request a copy of your data within the boundaries set by legislation.
- We only share your contact details and initial brief with the partner coach delivering the coaching. They keep the coaching notes arising from the sessions, and any psychometric data, privately, and do not share this confidential information with other partners. Your data may be held in paper format and/or electronically by your coach.
- We endeavour to ensure our partner coaches comply with the relevant data protection legislation.

3. THIRD PARTIES & SERVICE PROVIDERS

- We use third party service providers to do psychometric profiling or diagnostic assessments, or to provide administrative or accounting support.
- We will provide your name and email address to these providers only for the purpose of enabling the service we provide to you. Some of these providers may be outside the European Economic Area, and we endeavour to ensure they comply with the relevant data protection legislation.
- We may exchange information with third parties for the purposes of fraud protection and credit risk reduction. We will never sell or disclose your personal data to third parties without obtaining your prior consent, unless this is necessary for the purposes set out in this agreement or unless we are required to do so by law.
- We do not allow third party service providers to use your personal data for their own purposes, and only permit them to process your personal data for specific purposes and in accordance with our instructions.

4. PRIVACY & SECURITY

- We have in place appropriate security measures to prevent unauthorised or unlawful access to, or accidental loss of or destruction or damage to, your information. Our computer security obligations under law are fully covered, and our central backup is encrypted, covering our data for secure backup.
- We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your information. Our security procedures mean that we may request proof of identity before we disclose personal information to you.

5. DATA RETENTION

- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements
- We will keep a record of some of your contact data indefinitely, for the purposes of identifying you as a client
- We keep notes of coaching sessions for up to 6 years after the final session, after which time hard copies are shredded and electronic notes are deleted. This includes notes we make after coaching meetings to help ensure we can provide our services to you. These may be held on paper and/or electronically.

6. YOUR LEGAL RIGHTS AS AN INDIVIDUAL

Complaint to the ICO

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Your legal rights

Your legal rights are as follows:

1. The right to be informed: You have the right to be informed about our processing of your personal data.
2. The right of access to your personal data (a 'data subject access request'): This enables you to receive a copy of the personal data we hold about you and the information contained in this privacy policy. In most cases you will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, where your request is manifestly unfounded or excessive we may charge a reasonable fee for the administrative costs of complying with the request or refuse to comply with your request. We may also charge a reasonable fee if you request further copies of your data following a request.
3. The right to rectification: You have the right to have inaccurate or incomplete personal data rectified.
4. The right to erasure: You have the right to have personal data erased (this is also known as the 'right to be forgotten') in the following circumstances:
 - a) the personal data is no longer necessary for the purpose which we originally collected or processed it for
 - b) we are relying on consent as our lawful basis for holding the data, and you withdraw your consent
 - c) we are relying on legitimate interests as our basis for collecting and using your data, and there is no overriding legitimate interest to continue this collection and use
 - d) we are collecting and using your personal data for direct marketing purposes, and you object to that collection and use
 - e) we have processed your personal data unlawfully
 - f) we have to process your personal data to comply with a legal obligation.
5. The right to restrict processing: You have the right to request the restriction or suppression of your personal data. In other words, you can limit the way that we use your data. This is an alternative to requesting the erasure of your data. Your right to restriction may be because you have issues with the content of the information we hold, or how we have processed your data in the following circumstances:

- a) you contest the accuracy of your personal data and we are verifying the accuracy of the data
 - b) the data has been unlawfully processed, you oppose erasure and you request restriction instead
 - c) we no longer need the personal data but you need us to keep it in order to establish, exercise or defend a legal claim; or
 - d) you have objected to our processing your data and we are considering whether our legitimate grounds override those of you as an individual.
6. The right to data portability: You have the right to receive personal data that you have provided to us in a structured, commonly-used and machine readable format. You also have the right to request that we transmit this data directly to a third party. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. The right to object: You can object to the processing of your personal data. This effectively allows you to ask us to stop processing your personal data. The right only applies in certain circumstances, depending on our purposes for processing and the lawful basis for processing. You have the absolute right to object to the processing of your personal data if it is for direct marketing purposes.

YOUR CONSENT

You can withdraw your consent to our processing your data at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

By signing an agreement to work with Lindsay Wittenberg Ltd, or by your business sponsor or purchaser signing such an agreement, you consent to our keeping and processing your data as described in this Privacy Policy.

Please contact us in the first instance:

- If any of your personal information changes
- If you would like to request a copy of the information that we hold about you and/or notes we have kept of your coaching sessions
- If you have any questions, changes or requests regarding how we hold or use your personal information
- If you would like to withdraw your consent, request erasure of any of your information or object to how your information is used.

Please email us at lw@lindsaywittenberg.co.uk clearly stating your request.

Alternatively, write to us at: **Lindsay Wittenberg Ltd, 1 Heath View, London N2 0QD, UK.**