

Claire Cahill & Accendo Coaching & Training respects the personal data you supply to us and we will not disclose your personal data to third parties under any circumstances, unless required to do so by law.

We are committed to the principles of data protection and privacy and will carry out our business in the spirit of the General Data Protection Regulation (GDPR) 2018.

Information we collect

Our primary goal in collecting personal information from you is to provide you with a smooth and efficient experience while using our website.

We use a web analytics tool (Google Analytics) to analyse site usage, how our users arrive at our site, what they do on the site, what browser they are using and on what operating system. However, this analytics data, collected via a JavaScript tag in the pages of our site, is not tied to personally identifiable information.

Cookies - Our web analytics tool uses Google Analytics. If you do not know what cookies are, or how to control or delete them, then we recommend you visit <u>About Cookies</u> for detailed guidance. You can find out more about Google Analytics cookies here: <u>Google Analytics Cookies</u>

The following information describes the cookies we use on this site and what we use them for. Currently we operate an 'implied consent' policy which means that we assume you are happy with this usage. If you are not happy, then you should either not use this site, or you should delete Accendo Coaching's cookies having visited the site, or you should browse the site using your browser's anonymous usage setting (called "Incognito" in Chrome, "InPrivate" for Internet Explorer, "Private Browsing" in Firefox and Safari etc.)

Our website is hosted by Weebly. Here is their Privacy Policy for your reference <u>https://www.weebly.com/uk/privacy</u> All of our tutors are fully competent and approved to deliver our sessions, they all are bound to comply with the content of this Privacy Policy.

DISC Profile data - How we collect and store it

The DISC system provided by Accendo Coaching & Training is hosted by <u>PeopleKeys</u>, who are based in the USA. PeopleKeys are the controllers of this data. Any enquiry regarding your DISC personal data, should be directed to PeopleKeys for further information: <u>compliance@peoplekeys.com</u>

Your data protection is important to us - Please note that Peoplekeys USA are the controllers of your data and are fully GDPR compliant. Please see their Privacy Policy for any further information

here: https://peoplekeys.com/policies/privacy-policy

PeopleKeys have taken all necessary measures to ensure their personal data processing procedures are compliant for the purposes of GDPR.

The measures taken include:

- Identification of all personal data processing procedures
- Analysis of the risk related to personal data processing
- Selection of proper technical and organisational measures for personal data protection in order to ensure proper security of personal data, including protection against unlawful or illegal processing and their accidental loss, destruction or damage
- Conclusion or amendment of relevant personal data processing outsourcing agreements
- Adjustment of data collection procedures to standards imposed by the GPDR
- Preparation of internal documentation regarding personal data protection.



"Session" Cookies

<u>Google Analytics</u> – we use this to understand how the site is being used in order to improve the user experience. User data is all anonymous. You can find out more about Google's position on privacy as regards its analytics service at <u>Google Analytics</u>

<u>Social buttons</u> – On many of the pages of the site you will see 'social buttons'. These enable users to share or bookmark the web pages. There are buttons for: Twitter, Facebook and Linked In. In order to implement these buttons, and connect them to the relevant social networks and external sites, there are scripts from domains outside of http://www.accendocoaching.co.uk. You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on this site. So if you click on any of these buttons, these sites will be registering that action and may use that information. In some cases these sites will be registering the fact that you are visiting Accendo Coaching & Training and the specific pages you are on, even if you don't click on the button if you are logged into their services, like Google. You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

<u>External web services –</u> We use a number of external web services on the Accendo Coaching & Training site, mostly to display content within our web pages. For example, to display images we often use Flickr; to display slideshows we sometimes use SlideShare; to show videos we use Vimeo or YouTube. This is not an exhaustive or complete list of the services we use, or might use in the future, when embedding content, but these are the most common. As with the social buttons we cannot prevent these sites, or external domains, from collecting information on your usage of this embedded content. If you are not logged in to these external services then they will not know who you are but are likely to gather anonymous usage information e.g. number of views, plays, loads etc.

<u>Email tracking</u> – Some emails that we send you have no tracking in at all e.g. service emails with invoices attached. Other emails we send are via our third party provider, MailChimp, who puts in tracking so that we can tell how much traffic those emails send to our site but we do not know who has clicked so the data is anonymous. Some emails we can track, at an individual level, whether the user has opened and clicked on the email. We rarely use the latter information at a personal level, rather we use it to understand open and click rates on our emails to try and improve them. Sometimes we do use the personal information e.g. to re-email people who didn't click the first time. If you want to be sure that none of your email activity is tracked then you should opt out of Accendo Coaching & Training email newsletters. You can find out more on <u>MailChimp's website</u>

<u>Surveys & Contests</u> – From time to time our site may request information from users via surveys, contests or for a particular service (e.g. newsletter). Participation in these surveys or contests is completely voluntary and the user therefore has a choice whether or not to disclose this information. Information requested will include contact information (as supplied to the site during registration) and supplementary information on your professional interests, opinions and preferences. We will use the contact information to notify winners of any competitions. We will not publish winners' details on the site though on request we will provide details of any winner's name and organisation.

<u>Course Appraisal Questionnaires</u> – Attendees of our courses are requested to provide information to enhance their learning experience. Accendo Coaching also request that a Course Appraisal Form is completed by each attendee. The information requested is treated as confidential and used to ensure the continued improvement of our services. Anonymous statistical data collated from quantifying appraisal responses may be provided to third party regulatory and certification bodies to provide evidence of the high quality of service provided.



<u>Payment processing</u> – In order to process payments online we require the billing address for the credit card used and our external payment provider, Paypal, requires your credit card details. For details of how this information is used, please see below.

<u>Blog comments</u> – In order to leave a comment in our Blog you have to give us at least your Name and Email address. You can choose whether to post as yourself, or anonymously. We require name and email address even for anonymous posts for quality control purposes, such as monitoring comment spam.

Our Use of Your Information

We use your email address to send you newsletters or other communications (for example, digests of the blog posts) that you have requested from the Site. Out of respect for our users we offer an opt-out, see below.

<u>Payment Processing</u> – We take online payments for our guides and some of our services. We use Paypal as our external payment provider. In addition to the information outlined above, Paypal requires the billing address of the credit card you use so that they can check the address against the cardholder's details for security purposes. We don't store your credit card details or billing addresses on our systems. We may use the billing details in case we need to contact you regarding payments e.g. for an outstanding invoice or failed transaction. Paypal requires that you provide your credit card details to process the transaction. This is done on a secure Paypal server and data passing between Accendo Coaching & Training servers and Paypal are encrypted using SSL (Secure Sockets Layer). We do not store your Personal Information in our databases unless you are a private client of Accendo Coaching & Training. Please note that your information will be transferred outside the European Economic Area to the United States of America where it will be stored securely for backup purposes.

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

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Email Communications

On www.accendocoaching.co.uk you have the opportunity to opt in to various email communications. If at any stage you wish to no longer receive any emails that you receive from the site you can stop them coming by unsubscribing at the bottom of each email we send you.

Our Disclosure of Your Information

We do not sell or rent any personally identifiable information about you to any third party. Unfortunately, due to the existing regulatory environment, we cannot ensure that all of your private communications and other personally identifiable information will never be disclosed in ways not otherwise described in this Privacy Policy.



By way of example (without limiting the foregoing), we may be forced to disclose information to the government or third parties under certain circumstances, or third parties may unlawfully intercept or access transmissions or private communications. We can (and you authorise us to) disclose any information about you to law enforcement or other government officials as we, in our sole discretion, believe necessary or appropriate, in connection with an investigation of fraud, Intellectual Property Rights infringements, or other activity that is illegal or may expose us to legal liability.

Visibility of your information on the Site

Following are details of how your information is visible across the site depending on the site section and what you are doing:

<u>Blog Comments</u> – If you post a comment to our Blog then, by default, your name (first name, last name) will be published against your post.

<u>Legal Requests</u> – Accendo Coaching & Training cooperates with law enforcement inquiries and other third parties to enforce laws, Intellectual Property Rights and other rights. Local and international law enforcement agencies can request and may receive your personally identifiable information.

Other Information Collectors

Except as otherwise expressly discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are other visitors to this Site or other sites throughout the Internet, different rules may apply to their use or disclosure of the personal information you disclose to them.

Security

In order to process and help protect your credit card details, Paypal uses SSL (Secure Sockets Layer) process your orders. You can find out more about security on <u>Paypal's website</u>.

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Signed:

Date: 12/08/2024

Name: Claire Cahill Position: Owner