

## Privacy Policy

### Background

At Grow Development Solutions (GDS) We respect and value the privacy of all Our stakeholders, ensuring their personal data is collected, used and shared in-line with legislative and regulatory requirements (such as the General Data Protection Regulation and Data Protection Act 2018) and the regulations of those organisations We work with (such as Awarding Bodies: City & Guilds, The Institute of Leadership & Management).

Please read this Privacy Policy carefully as it contains important information on who We are, how and why We collect, store, use and share your personal data, your rights in relation to your personal data, how to contact Us, and how to contact supervisory authorities in the event that you would like to report a concern about the way in which We process your personal data.

Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Website. If you do not accept and agree with this Privacy Policy, you must stop using Our Website immediately.

#### 1. About Us

Grow Development Solutions Ltd provide a range of training, coaching and consultancy services to businesses and individual participants.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), Grow Development Solutions Ltd (GDS) is the 'controller' of business and individual participants personal data. Our registered address is Eventus, Sunderland Road, Market Deeping, Peterborough, PE6 8FD.

#### 2. Definitions & Terminology:

In this Policy, the following terms shall have the following meanings:

"Account"	Refers to an account required to access and/or use areas of Our website and features of Our site.
"Cookies"	Refers to a record of the sites visited and actions on the web site. Some cookies expire after your browser is closed whilst others stay on your hard drive. More details about cookies and how We use them is included in Section 13.
"Personal Data"	Refers to data that relates to an identifiable person who can be directly or indirectly identified from that data. Examples of personal data are

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name, address, phone number and e-mail address. Under certain circumstances, information about the IP address and your user activity may also constitute Personal Data. In this case, it means personal data that you give to Us via Our Website. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).

- “Data Controller” Refers to a person, or a company or other body that determines the purpose and means by which personal data is processed. This definition shall, where applicable, incorporate the definitions provided in Article 4.7 of the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).
- “We/Us/Our” Refers to Grow Development Solutions Ltd, a limited company registered in England, Company Registration: 8231317.

### 3. Scope of this Policy

This Privacy Policy applies only to your use of Our Website. Our Website may contain links to other websites. 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.

### 4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
- 4.1.1 The right to be informed about Our collection and use of personal data
  - 4.1.2 The right of access to the personal data We hold about you (see Section 12)
  - 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in Section 14)
  - 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you. (We only hold your personal data for a limited time, as explained in Section 6 but if you would like Us to delete it sooner, please contact Us using the details in Section 14)
  - 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data
  - 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation)

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4.1.7 The right to object to Us using your personal data for particular purposes, and

4.1.8 Rights with respect to automated decision making and profiling

4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in Section 14 and We will do Our best to resolve your cause for complaint for you. Should We be unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (the ICO)

4.3 For further information about your rights, please contact the ICO or your local Citizens Advice Bureau.

Information Commissioner's Office

<https://ico.org.uk/concerns/>

Telephone: +44 303 123 1113

## 5. What Data Do We Collect?

Depending upon your use of Our Website, We may collect some or all of the following personal and non-personal data (please also see Section 13 on Our use of Cookies):

5.1 name

5.2 date of birth

5.3 gender

5.4 business/company name

5.5 job title

5.6 profession

5.7 contact information such as email addresses and contact numbers

5.8 demographic information such as postcode, preferences, and interests

5.9 financial information such as credit / debit card numbers

5.10 IP address

5.11 web browser type and version

5.12 operating system

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5.13 a list of URLs starting with a referring site, your activity on Our Website, and the site you exit to

## 6. How Do We Use Your Data?

6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR and DPA at all times.

6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

6.2.1 Providing and managing your Account with Us

6.2.2 Providing and managing your access to Our Website

6.2.3 Personalising and tailoring your experience on Our Website

6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you)

6.2.5 Personalising and tailoring Our products and services for you

6.2.6 Replying to emails from you

6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by clicking on the 'unsubscribe' link where relevant)

6.2.8 Market research

6.2.9 Analysing your use of Our Website and gathering feedback to enable Us to continually improve Our Website and your experience whilst on Our Website

6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the DPA, GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

6.4 Third parties and Google Analytics whose content appears on Our Website may use third party Cookies, as detailed below in Section 13. Please refer to Section 13 for more information on controlling Cookies. Please note that We do not control the

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activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods:

6.6.1 Activity Consent and Medical Forms are kept for 3 years which is a legal requirement unless the person is under 18 then their forms must be kept for 3 years after the date of their 21st birthday.

6.6.2 Any other documents containing an individual participants' personal details (i.e. not their Companies details) will be kept for 3 years before being disposed of in a secure way.

## 7. Legitimate Interests

7.1 Legitimate interests means the interests of Our company in conducting and managing Our business. This allows Us to give you the best service/products and the best and most secure experience.

7.2 We have an interest in making sure Our marketing is relevant to you, so We may process your information to send you marketing that is tailored to your interests. It can also apply to processing that is in your interests as well.

7.3 When We process your personal information for Our legitimate interests, We make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - We will not use your Personal Data for activities where Our interests are overridden by the impact on you (unless We have your consent or are otherwise required or permitted to by law).

## 8. How and Where Do We Store Your Data?

8.1 We only keep your personal data for as long as We need to in order to use it as described above in Section 6, and/or for as long as We have your permission to keep it.

8.2 Some or all of your data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and

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Liechtenstein). You are deemed to accept and agree to this by using Our Website and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

8.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Website.

## 9. Do We Share Your Data?

9.1 We will only share your data with third parties when required to do so to allow Us to register you onto a qualification or approved programme that you may enrol onto with Us. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

9.2 Employees and Associates who work with Us will have access to your data to allow them to carry out their duties effectively. For example, if you make a course enquiry one of Our Associate facilitators or coaches might contact you by telephone to discuss a course in more detail with you.

9.3 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.

9.4 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

9.5 We may compile statistics about the use of Our Website including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

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9.6 We may sometimes use third party data processors that are located outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

## 10. How Can You Control Your Data?

10.1 In addition to your rights under the GDPR, set out in Section 4, when you submit personal data via Our Website, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details and by managing your Account).

10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 11. Your Right to Withhold Information

You may access certain areas of Our Website without providing any data at all. However, to use all features and functions available on Our Website you may be required to submit or allow for the collection of certain data.

## 12. Accessing Your Data

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any information in response to your request free of charge. Please contact Us for more details at: [enquiries@growdevelopmentsolutions.com](mailto:enquiries@growdevelopmentsolutions.com) or using the contact details in Section 14.

## 13. Use of Cookies

Our Website may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies

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to facilitate and improve your experience of Our Website and to provide and improve Our products and services. Because Our Website is powered by WordPress, their Cookies are also used on Our Website as well. By using Our Website you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Website for tracking and analytics. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Website.

### 14. Contacting Us

If you have any questions about Our Website or this Privacy Policy, please contact Us by email at [enquiries@growdevelopmentsolutions.com](mailto:enquiries@growdevelopmentsolutions.com) or by telephone on 01778 382781, or by post at Grow Development Solutions Ltd, Eventus, Sunderland Road, Market Deeping, Peterborough, PE6 8FD. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

### 15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, in line with our own internal policy changes, regulatory or legislative changes). Any changes will be immediately posted on Our Website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Website following the alterations. We recommend that you check this page regularly to keep up to date with any changes we make.