

# Data Security and Privacy Policy

## Introduction

The laws on data privacy changed this year. On the 25<sup>th</sup> May 2018 the new General Data Protection Regulations (GDPR) comes into effect, replacing the Data Protection Act 1998.

UCan Training is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

This privacy policy details and addresses:

- How we collect personal information
- Why we collect personal information
- How we store personal information
- How long we hold personal information for
- Third party distribution and
- Your rights as a customer

## About us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by UCan Training Ltd, a private limited company with company number 6076461.

UCan Training is based at Lake Cottage, Lake lane, Dockenfield, Farnham GU10 4JB.

For the purposes of the data protection law, UCan Training Ltd will be the controller.

## Personal data

For clarity purposes we have broken down our Personal data into 2 separate categories.

The first category identified is **Non-Sensitive Personal Data**.

This data includes such things as:

- Full name
- Email address
- Telephone number
- Address
- Name of company

The second category identified is that of **Sensitive Personal Data**.

This includes sensitive data on a more personal level. It is specific and personal to each individual, and details such things as precise areas of coaching needed, current situations, goals and ambitions.

## **How and why Ucan Training collects personal information**

### **Non-Sensitive Personal Data**

UCan Training collects Non-Sensitive Personal Data when you, the customer, directly contact us. We collect this information, as we believe you are contacting us so that UCan Training can provide you or your company with bespoke training and coaching programmes, to help you or your staff achieve their full potential.

We keep this information so that we can contact you and form a beneficial working relationship. We may contact you regarding a current course or programme in which you or your company are partaking, a past course or programme that you or your company partook, or if we feel there is something that we offer that might be of specific interest to you in the future.

UCan Training strictly limits marketing material that we send for new and upcoming programmes, and tailor distribution specifically so that customers only receive publicising information that we feel is really relevant to them.

### **Sensitive Personal Data**

Sensitive Personal Data is collected before, during and after coaching and training sessions. These might be in the form of pre-course questionnaires, notes made during sessions and feedback forms.

Questionnaires and interviews are used to understand as fully as possible the requirement for the coaching or training, so as to enhance content and ensure the course is fully applicable to each individual client.

Notes are made to make sure all issues that arise are fully addressed and resolved, and also to act as a log that can be called upon in the future during follow-up sessions.

Feedback forms are a vital tool in our continual strive for excellence, and allow us to see where we are succeeding, and where possibly there maybe room for improvement.

Another source of Sensitive Personal Data are discussions that take place on instant messaging groups. These groups are set-up during group coaching sessions, to act as a network tool; giving attendees a sense of community and the ability to bounce ideas and share relevant stories with others in the group.

Sensitive Personal Data is also held in the form of video and audio files from recordings of training and coaching sessions. These files are only created and stored with definitive prior consent. They can be sent to clients and therefore provide them with their own log of the session, as well as for UCan Training to use as a time line for a client's progression and development.

## **How UCan Training stores Personal Information**

All Personal Data, if stored in a physical form, is kept in a locked filing system, within locked premises, accessible only by authorised personnel. All electronic data is stored on either locked or encrypted hardware and, as above, can only be accessed by authorised persons.

## How long UCan Training holds Personal Information

### Non-Sensitive Personal Data

Personal Data that UCan Training deems relevant for potential future work is held for a period of up to 5 years following the previous last contact with the customer. After this time, both physical and electronic records will be destroyed and / or deleted.

Personal Data that is regarded as no longer relevant shall be deleted in both its physical and electronic forms.

Periodic audits will take place to ensure all data held remains relevant.

### Sensitive Personal Data

Both physical and electronic records, including audio and video files, collected from clients before, during and after coaching sessions, will be held for 2 years from the date of the last session. This data is held so that if the client requires further sessions within the 2-year period, then the records held can be referred to for reference.

Data (in the form of messages) held within instant messaging groups will be deleted within 12 months of radio silence from the entire group. At any point prior to the 12 months, any member who wishes to remove themselves from the group may do so at their own will, offering no advance warning to the other members of the group.

### Third party distribution

UCan Training does not distribute any data to any third parties. All data is held in the strictest confidence, and is used only to ensure that UCan Training can continue to provide its clients with a service that is second to none, and proven undeniable results.

## Your rights as a customer of Ucan Training

- **Your right to be informed**  
As of 25<sup>th</sup> May 2018 you have a right to know what is happening to your data. This privacy policy acts as UCan Training's information guide to you, so all our handlings of your data are transparent, clear and set out for you to understand and agree too.
- **Your right to access your data**  
At any point in time you can exercise your right to submit a Subject Access Request (SAR), so you can view any data UCan Training holds on you as a client.
- **Your right to rectification**  
At any point in time you have the right to correct any data UCan Training may hold on you.
- **Your right to erasure**  
At any point in time you have the right to have certain kinds of data deleted under certain circumstances.

- **Your right to restrict processing**

At any point in time you have the right to stop UCan Training using your data in certain ways.

- **Your right to object**

At any point in time you have the right to object to UCan Trainings use of your data

## **Changes to our privacy policy**

UCan Training regularly reviews its privacy policy, and we will place any changes or updates on our website. This policy was last updated on 24<sup>th</sup> May 2018.