

# Active Development Ltd

## Privacy Policy

Updated April 1<sup>st</sup> 2018

### 1.0 Purpose of this Policy

We are committed to protecting any personal data we hold and being transparent about the reasons for holding it and what we utilise it for. Personal information underpins the work we do with clients and the consulting and coaching outcomes we deliver.

It is important that you read and understand this privacy policy, along with any other statements, policies or notices that we provide when we are collecting, holding or processing personal information. This will allow you to be aware of how and why we are using that personal information.

We will use the information we collect in accordance with;

- The Data Protection Act 1998
- The Privacy and Electronic Communications (9EC Directive) Regulations 2003
- The EU General Data Protection Regulation (Regulation EU 2016/679), effective from May 25<sup>th</sup> 2018.

### 2.0 Who we are

Active Development Ltd is a consultancy business registered in England and Wales, limited by guarantee, company number 7252307.

### 3.0 Information we may collect about you

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

***Data we may hold or be provided with access to can include;***

- Identity Data – including name, title, date of birth and gender.
- Contact Data – including physical and email addresses and telephone numbers.
- Communications Data – records, held electronically or otherwise, of communications between us.
- Information you provide to us in the course of delivering our services

Certain tools used in coaching and career consultancy may additionally collect, use and share Aggregated Data to inform the coaching activity. This may be derived from personal information, but is not considered personal information as it does not directly or indirectly reveal your identity.

***We DO NOT collect or hold;***

- Financial Data – bank account or payment card details of individuals.
- Usage Data – about how you may use our website.
- Special Categories of Data (biometric data, health, criminal convictions or offences, political opinions, membership of any organisations, race, ethnicity, religious beliefs etc.)

***Failure to Provide Necessary Information***

Where we need to collect personal information by law or under the terms of a contract that we have with you (directly or indirectly) and you fail to provide that information when requested, we may not be able to perform the contract that we are seeking to, or have, entered. In this case we may have to cancel a service we intended to provide, but we will notify you of this along with any contractual consequences that could apply.

## **4.0 How we collect data**

We collect or are provided with information about you;

From information you provide to us – we may collect and store information in the categories specified above sourced from any communications between us prior to, or during, provision of contracted services.

Information from third parties – in order to provide a contracted service we may be provided with personal information by your employer.

## **5.0 How do we use your data?**

We utilise personal information only to the extent to which the law allows us to and to provide the services we are delivering under a contract we have entered into, about to enter into or have reasonable expectation of entering into. In the case of coaching services, this contract may be with your employer, and also we may be acting as subcontractor to another party in delivering services.

We may also use or share personal information as required by applicable law, legal process or regulation; or to investigate and help prevent security issues and abuse.

We are required to have a lawful basis to process the information we hold about you.

When you are working with Active Development, our use of personal information for all these activities is based on;

- the performance of a contract to which the data subject is a party (purposes 1 and 6-7),
- processing necessary to comply with legal obligations (purposes 5-7) and/or
- processing necessary in the legitimate interests of Active Developments in exercising its and its staff's fundamental rights to run a business (purposes 1-7)

## **6.0 What do we use your data for?**

We use personal information in order to provide business consultancy services. The nature of these will be specific to each particular contract (actual, intended or potential) but in all cases we limit the amount of personal data we collect, hold and process to that needed to perform the specific activity.

## **7.0 Disclosure of your details to third parties**

We do not sell personal details to third parties for any purpose.

There are certain situations when we may disclose personal information to third parties;

- Where we are under a legal or regulatory obligation to disclose personal information.
- Where we are obligated to in order to deliver contractual obligations and these do not conflict with your fundamental rights. (For example, to provide employers with updates on progress of coaching programmes).

## **8.0 Security of your data**

*How is your data stored*

- Where data is held non-electronically (eg. on paper);
  - Where Personal Information is captured on forms, these are designed such that information is not associated with any personal identifiers, and that information is transferred to electronic form as soon as practicable and the original paper copy destroyed.
- Where data is held electronically and on systems controlled by Active Development;
  - Data is held on devices with access controlled by password (and, where possible, by biometric control)
  - Data is held in an encrypted format
  - Devices re equipped with remote control such that access to them can be remotely prevented, and any data deleted if loss or theft is detected.
  - Local encrypted backups are held on password controlled devices.
  - We make remote copies of the local backups as a further step in data security. The provider we use has stated that it complies with GDPR.
- Where data is held electronically and NOT on systems controlled by Active Development (eg. where we are acting as a subcontractor, or the system is provided by the employer of a coaching client), the owner and operator of that system is responsible for the management of personal data.

### ***Data Retention Periods***

We only retain personal data for as long as necessary to fulfil the purpose we collected it for, plus to satisfy any legal, regulatory or reporting requirements.

Where we do retain personal data after a contractual service has been completed (or no contract is entered into) we consider the amount, nature and sensitivity of the personal data alongside other factors in determining an appropriate retention period. In general, if personal data has not been used within 6 months and that particular item of data is deemed unlikely to be used within the next 3 months, it is deleted (subject to any legal, regulatory or reporting requirements).

## **9.0 Your rights**

- *Right to access and obtain a copy of your personal information.* You are entitled to request confirmation whether we process any of your personal information. Where this is the case, you may have access to your personal information and to certain information about how it is processed.
- *Right to correct your personal information.* If you can demonstrate that personal information we hold about you is not correct, you can ask that this information is updated or otherwise corrected. If there is a self-service system, we really encourage you to access it and update it yourself.
- *Right to be forgotten/have data deleted.* If we do not need to retain or process the data for any other reason, you may request that we stop processing or delete (some of) your personal information.

If you want to exercise any of your rights, please email us at [info@active-development.co.uk](mailto:info@active-development.co.uk)  
When you email us to exercise your rights, the Company may ask you to identify yourself before  
actioning your request.

Finally, you have the right to lodge a complaint with your local national privacy supervisory  
authority.

## **10.0 Data Protection Authority**

The data protection authority is the UK Information Commissioner's Office, <https://ico.org.uk>.

## **11.0 Changes to the Privacy Policy**

We may modify this Privacy Policy at any time, and such modifications shall be effective upon posting  
of the modified Privacy Policy. Notification of material changes to this Privacy Policy will be provided  
by noting a new "updated" date that appears at the bottom of each page.

## **12.0 Contact Us**

If you have any questions about this Privacy Policy, please contact us at:

[info@active-development.co.uk](mailto:info@active-development.co.uk)

Active Development Ltd

2 Pioneer Close

Northampton

NN4 6RR

+44(0)1 604 708 064