

## Privacy Notice

Renewal and Optimism Coach Ltd respect your privacy and are determined to protect your personal data. The purpose of this Privacy Policy is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how data protection law protects you.

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## Introduction

Renewal and Optimism Coach Ltd processes personal data in relation to its own staff and individual client contacts and is a data controller for the purposes of the Data Protection Laws. The Company has registered with the ICO and its registration number is ZB561629.

## 1. WHO WE ARE AND IMPORTANT INFORMATION

### What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you sign up for our services.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

## Data controller(s)

Renewal and Optimism Coach Ltd is the controller and responsible for your personal data (collectively referred to as ["Renewal and Optimism Coach Ltd"], "we", "us" or "our" in this privacy notice). Our contact details are [Renewal and Optimism Coach Ltd, 3 Wildwood Court, Hawkthirst Road, Kenley CR8 5DL. For all data matters contact admin@renewalandoptimismcoach.com.

## Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

The Company may hold personal data on individuals for the following purposes:

- Staff administration;
- Advertising, marketing and public relations;
- Accounts and records;
- Administration and processing of client's personal data for the purposes of providing coaching services, including processing using software solution providers and back-office support.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you for providing coaching services.

## 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

- **Directly.** You may give us your personal details by filling in our "contact us" forms or by corresponding with us by post, phone, email or otherwise.

## 4. HOW WE USE YOUR PERSONAL DATA

Renewal and Optimism Coach Ltd will only use your personal data when the law allows us to. We will collect and process your personal data for the purposes of providing you with coaching services. This includes to provide our career coaching, career workshops, outplacement and online career services; individual contacts for our corporate clients and our suppliers; our employees, career coaches, licensees and franchisees and business connections.

The legal bases we rely upon to offer these services to you are:

- Consent
- Legitimate Interest Consent
- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract. Renewal and Optimism Coach Ltd has certain legal and contractual requirements to collect personal data on requests from individuals and clients that would like to engage with services and/or we may need your data to enter into a contract with you. If you do not give us your personal data we will not be able to continue our support in your coaching.

The personal data collected by Renewal and Optimism Coach Ltd that is obtained from you would include:

- Name
- Address and contact details
- Employment history
- Skills, Education, and qualifications
- Any other relevant professional or personal information relevant to your career situation e.g. salary details
- Summary and action plans will be produced as a result of coaching sessions and sent to the coachee
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do 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).

Where Renewal and Optimism Coach Ltd has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our coaching and outplacement services to individuals and corporate clients;
- It is necessary to hold your personal data to support the delivery of these services;
- We will ensure to process your rights to have your data removed on request

Renewal and Optimism Coach Ltd has implemented measures and procedures that adequately protect the privacy of individuals and ensures that data protection is integral to all processing activities. This includes implementing measures such as:

- data minimisation (i.e. not keeping data for longer than is necessary);
- employee training; and
- an annual review of this policy and our data protection procedures.

- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on [admin@renewaloptimismcoach.com](mailto:admin@renewaloptimismcoach.com).

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [admin@renewaloptimismcoach.com](mailto:admin@renewaloptimismcoach.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. WHO WE SHARE YOUR PERSONAL DATA WITH**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties who provide coaching and administrative services
- External Third Parties Service:
  - Providers acting as processors who provide assessment, coaching and administrative services.
  - Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
  - HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom who require reporting of processing activities in certain circumstances.
  - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. INTERNATIONAL TRANSFERS**

Renewal and Optimism Coach Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with our Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

Renewal and Optimism Coach Ltd will retain your personal data only for as long as is necessary to the purpose of legitimate business interests or to comply with legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers including contact, identity, financial and transaction data for six years after which the cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact [admin@renewalandoptimismcoach.com](mailto:admin@renewalandoptimismcoach.com).

### **No fee required – with some exceptions**



You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

THIS VERSION WAS LAST UPDATED ON JUNE 2023.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## **11. QUERIES, REQUESTS OR CONCERNS**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our DPO team on [admin@renewalandoptimismcoach.com](mailto:admin@renewalandoptimismcoach.com).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

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