

## Project Resilience Privacy Policy for End Customers

**Last Updated:** June 2020

### Introduction

Project Resilience is committed to protecting the privacy and security of the personal data we collect about end customers and users of our services (“you/your”). Also, to ensuring we meet our legal obligations when processing your personal data.

The purpose of this privacy policy is to explain what personal data we collect about you when we provide our training and coaching services to you and/or your employees. When we do this, we are the data controller.

Please read this privacy policy carefully as it provides important information about how we handle your personal information and your rights. If you have any questions about any aspect of this privacy policy you can contact us using the information provided below or by emailing us at [kathryn@project-resilience.co.uk](mailto:kathryn@project-resilience.co.uk).

### Personal data we collect

We collect and process your personal data when providing our services to you. The personal data we collect includes:

- Your name
- Billing Address
- Telephone numbers
- Email address
- Marketing opt in and preferences
- Bank accounts details (if you pay by direct debit)
- Credit or debit card details (if you make a payment by card)
- Any other personal data you provide to us

If you are a participant on one of our programmes we do request sensitive personal data in our intake forms. Safety is one of our core values. We therefore request this data to help us secure your emotional, social and physical safety whilst on the programme. If you chose to share this with us, this data will be deleted once you have completed the programme.

### Purposes for which we use personal data and the legal basis

When providing services to you, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful basis for processing
<b>Provide a stress management and resilience training service to you.</b> Including understanding your social, physical and mental needs so we can ensure you effective support is provided on the programme.	Necessary to effectively support you or your business and employees on the programme you have bought.
<b>Take payment for services.</b> By direct debit, credit card or debit card, for the energy services we have or will provide to you.	Necessary for the performance of the agreement to which you are a party.

<b>Respond to correspondence from you.</b> Including enquiries, complements and complaints. .	Our legitimate business interest to respond to your correspondence, including enquiries, complements and complaints.
<b>Contact you for feedback.</b> Including sending you customer satisfaction surveys.	Our legitimate business interest to collect your feedback, develop our products and services and improve our business.
<b>Internal management, administrative and organisational purposes.</b> This includes maintaining internal records and carrying out other business administration tasks.	Our legitimate business interest to process your personal data in order to manage our business.
<b>Statistics and other data analysis.</b> This includes creating forecasts and business plans, improving our services and developing new services.	Our legitimate business interest to process your personal data to develop and improve our business through aggregated and anonymised reporting and analysis.
<b>Sharing data with other third parties.</b> Including third parties who process personal data on our behalf.	Our legitimate business interest to share your data with trusted third parties who provide us with services relevant to our provision of services to you.
<b>Meet our legal obligations.</b> Including any laws or regulations which apply to us	Necessary to comply with legal obligations to which we are subject.
<b>Detect and prevent crime, fraud or loss.</b> Including stealing energy such as by tampering with a meter.	Our legitimate business interest to detect and prevent crime, fraud and loss.

Where personal data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

## Sharing your Data

We may share your personal data with trusted third parties who provide the licenses for the methods and frameworks we use in our training. These include Mind5 Training Ltd and AQR International who supply the MTQ48 and MTQ Plus psychometric measure for the Mental Toughness 4Cs framework.

We share your personal data with trusted third parties who provide data processing services to us to such as SmartSurvey and ConvertKit. All such third parties are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. We may also share your personal data where we are required to do so by law.

In some circumstances, we or one of our suppliers may host, store or handle your personal data outside the European Economic Area. We will only permit this to happen if the country in which your personal data will be processed benefits from a European Commission adequacy decision or where standard contractual clauses approved by the European Commission have been put in place with the recipient which contractually oblige it to process and protect your personal data to the standard expected within the EU/EEA.

## How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.

At the end of the retention period, your personal data will be securely deleted or anonymised, for example by aggregation with other data, so that it can be used in a non-identifiable way for statistical analysis and business planning.

## Your rights and options

You have the following rights in respect of your personal data:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.
- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- Where we are using your personal data for direct marketing, including profiling for direct marketing purposes, you can object to us doing so.
- You can ask us to restrict the use of your personal data if:
  - It is not accurate.
  - It has been used unlawfully but you do not want us to delete it.
  - We do not need it any-more, but you want us to keep it for use in legal claims; or
  - If you have already asked us to stop using your data but you are waiting to receive confirmation from us as to whether we can comply with your request.
- In some circumstances you can compel us to erase your personal data.

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 fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, please contact us at [kathryn@project-resilience.co.uk](mailto:kathryn@project-resilience.co.uk).

You can also lodge a complaint with the Information Commissioner's Office. They can be contacted using the information provided at: <https://ico.org.uk/concerns/>.

## Contact us

If you have any questions, or wish to exercise any of your rights, then you can contact: Kathryn Humphreys, Project Resilience, International House, 61 Mosley Street, Manchester, M2 3HZ.

Alternatively, you can email us at [kathryn@project-resilience.co.uk](mailto:kathryn@project-resilience.co.uk).

## Changes to this privacy policy

We may update this policy (and any supplemental privacy policy), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified June 2020. This is the first version of this privacy policy.