

Waterfall People Development Ltd

Privacy Statement

Personal Data is important, and Waterfall People Development is committed to protecting your privacy.

Overview

Waterfall People Development, trading as Waterfall Coaching, will only collect and retain personal data that is required to deliver our services as a Coaching and Learning and Development Consultancy. We will process and retain that data only for the lawful basis specified, which in the majority of cases will be to fulfil contractual requirements.

Personal data will be shared only with those individuals and organisations necessary to deliver the services you have requested as part of your contract. It will not be shared with other third parties without obtaining your prior consent.

Should the aim for collecting and retaining personal data falls outside contractual requirements, we will ask for your express permission. Examples might include for marketing or promotional purposes, or for quality assurance.

Personal data that we have collected and retained for contractual purposes and no longer require for the continued delivery or promotion of our services will be deleted or destroyed as soon as it is no longer required. Additionally, should the purpose for our collection of personal data change, we will notify you of this and seek a new consent from you.

Data Protection – Personal Rights

The GDPR provides individuals with certain rights in relation to their personal data. You have the following rights:

- to be informed of and have access to the personal data we hold about you.
- to ask us to correct any inaccurate data
- once our use of your personal data is complete, to request that it be disposed of and deleted
- to request a restriction on processing your personal data
- to ask us to provide electronically stored personal data in a format that can be easily accessed by other technological methods

You have the right to ask us to provide electronically stored personal data in a format that can be readily accessed by other technological means. You also have the right to object to our processing of your data that has been collected for non- contractual purposes such as quality assurance, marketing or promotional purposes.

You have the right to complain to the Information Commission's Office (ICO) if you are unhappy with the way we are processing your data.

Who is Collecting the Data?

Waterfall People Development is the Data Controller and you are welcome to contact us at any time to discuss the information we hold on you by emailing helen@waterfallcoaching.co.uk. Examples of the kind of things you may want to contact us about is to request to be deleted from our database or request a copy of what information we are holding.

What types of personal data do we use?

Clients

We collect contact data from clients in order to respond to requests for work proposals and for delivering contract work.

When we complete a contract, we retain contact data to:

- respond to requests from clients for further provision of services
- request references to support proposals for work to other clients.
- provide information on related services or products that may be of interest to our client.

Contact data is deleted or destroyed five years after the last contact with a client or on request from a client under their right for data to be erased.

Contact data relating to financial transactions are retained for the minimum business accounting period specified by HMRC.

Course Participants

We collect and retain the names, functions and contact details of participants attending our training courses for the following purposes:

- Notifying the client of participants' attendance
- Providing certificates of attendance when required by the client

Contact data is deleted or destroyed at the completion of the contract or within the specific phase of an ongoing recurring contract (e.g. a 1-year development programme) with a participant **or** on request from a participant under their right for data to be erased.

On some events, we ask participants to evaluate the quality of our services by completing post-learning written

feedback, which attendees have the option to anonymise. This data is used in various ways:

- Respond to individuals who have specific concerns or comments that we feel require follow-up
- Provide the individual with information about related products or services that may be of interest to them, but only if clear and explicit consent has been given
- Use their comments for promotional purposes, but only where clear and explicit consent has been requested and given.

Coaching Clients

1. We collect and retain the names and contact details of those who are involved in our coaching programmes so that we may:
 - a. Contact participants to arrange sessions
 - b. Notifying the client of participants' attendance
 - c. Providing information about related products or services that may be of interest to the individual, but only where clear and explicit consent has been given
2. Contact data is deleted or destroyed 5 years after the last contact with a coaching client or on request from a coaching client under their right for data to be erased.
3. Issues of confidentiality and what information can be shared with the coaching client's line manager and/or Waterfall People Development is covered by a Coaching Contract signed by the coaching client, their line manager and the coach. In general, the coach would only share information with the line manager or Waterfall People Development:
 - a. Where there is a legal imperative to act on the knowledge
 - b. Where there is a breach of the organisation's policies for behaviour
 - c. Where the facilitator has been obliged to curtail or otherwise alter the coaching programme at the request of or because of the behaviour of the coaching client
 - d. Where a participant has self-elected to leave the programme early or has otherwise disengaged from the learning process.
4. At the end of each coaching session, we ask the coaching client to evaluate their progress against their coaching goals, to what extent they have been supported and challenged by the coach and their commitment to continuation of the coaching programme. This is primarily so the coach can assess and demonstrate progress, but it is shared with Waterfall People Development, so it can be amalgamated with data from other participants on the same programme, and anonymised. The raw individual data is destroyed once it has been processed in this way.
5. Notes taken by the coach that may contain personal details of the coaching client are destroyed once the coaching programme has concluded and there is no longer any reason for the coach to retain the information under the current contract.
6. Where coaching clients are the subject of online surveys, e.g. 360-degree surveys, or psychometric reports, the data is used by a coach assigned to the programme to provide structured feedback and recommend development action. Copies of the reports are provided to the individuals. Anonymised copies of the reports are shared with Waterfall People Development for the purpose of amalgamation with data from other participants on the programme for group diagnostic and assessment purposes. Individual reports are destroyed after use in this way.

Suppliers

1. Suppliers are broadly defined by the following groups:
 - a. Associate consultants and actor/facilitators who are currently working with Waterfall People Development and have signed a current 'associate contract'
 - b. Associate consultants who have a historical connection with Waterfall People Development but have not worked for the organisation within the last five years
 - c. Associate consultants who have connections with Waterfall People Development through some form of collaboration, but who have not worked for the organisation.
2. Suppliers' contact details are collected and retained so that Waterfall People Development can:
 - a. Ascertain their interest, availability and suitability for inclusion in tenders for work and for the delivery of services
 - b. Provide updates on developments within Waterfall People Development for promotional purposes
3. Supplier contact data is deleted or destroyed on request from a supplier under their right for data to be erased, unless Waterfall People Development is legally required to retain the data.
4. Supplier contact data relating to financial transactions are retained for the minimum period specified by HMRC for the retention of financial accounts.
5. Sensitive personal data held by Waterfall People Development about suppliers in order to tender for work may include:
 - a. Employment and career history, and academic and professional achievements (CV)
 - b. Feedback from clients, participants and coaching clients
 - c. References from previous employers and previous clients
 - d. Permission for use of this data in this way is explicitly provided by the supplier signing the associate contract. Signing the associate contract makes an explicit statement that the supplier

- e. has the consent of their clients and previous employers to use feedback and reference data in this way. The Permission can be revoked at any time under the supplier's
 - f. right for data to be erased.
6. Sensitive personal data held by Waterfall People Development to meet contractual conditions may include:
- a. Disclosure Certificates or other forms of security clearance
 - b. Professional indemnity and public liability insurance certificates
 - c. Permission for the collection and retention of this data is explicitly provided by the supplier signing the associate contract. The Permission can be revoked at any time under the
 - d. supplier's right for data to be erased.
7. Sensitive personal data held by Waterfall People Development for quality assurance purposes may include:
- a. Employment and career history, and academic and professional achievements (CV)
 - b. Feedback from clients, participants and coaching clients
 - c. Permission for the collection and retention of this data is explicitly provided by the supplier signing the associate contract. The Permission can be revoked at any time under the
 - d. supplier's right for data to be erased.

Use of our website Waterfall Coaching

In general, you can browse our web site without giving us any personal information. We use third party services, such as Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

If you use the Contact Us form on our website we will collect any information that you provide to us, for example your name and contact details so that we may respond to your enquiry or to provide additional information and stay in contact with you. All the terms mentioned above apply to contact information provided via our website.

In addition, we wish to inform you that Google Analytics and other third-party service companies collect web usage data to track and monitor usage of our website.

Use of Cookies

We use Cookies to collect information such as how you use our website, the frequency with which you access our website, your browser type, the location you view our website from, the language you choose to view it in and the times that our website is most popular. We do not make any attempt to find out the identities of those visiting our website. A "Cookie" is a piece of information that is stored on your computer's hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes. Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

Links to Other Web Sites

Our web site may contain links to information on other web sites. On web sites we do not control, we cannot be responsible for the protection and privacy of any information that you provide while visiting those sites. Those sites are not governed by this Privacy Policy, and if you have questions about how a site uses your information, you'll need to check that site's privacy statement.

Contacting Waterfall People Development

If you wish to contact Waterfall People Development about your data held by us, please contact us at: Waterfall People Development, 1 Swan Way, Church Crookham, Fleet, Hants, GU515TU or helen@waterfallcoaching.co.uk