

Privacy Statement

Last revised 3rd April 2024

Privacy Summary

This privacy statement applies to Workforce Challenge Partners available at workforcechallenge.com/about-us.

Workforce Challenge Partners are committed to protecting your information by handling it responsibly and safeguarding it using appropriate technical, administrative and physical security measures.

The privacy notice below explains what information we gather about you, what we use it for and who we share it with. It also sets out your rights and who you can contact for more information or queries.

Information about you that we process

We may process information about you that: (i) you provide to us, (ii) that we obtain from third parties or (iii) that is publicly available. This information may include your name, age, gender, date of birth and contact details. It may also include 'sensitive' or 'special categories' of personal data, such as health. For a more detailed description of the information about you that we may process, please see section 2 below.

How we use information about you

We collect and process information about you and/or your business to enable us to:

- provide our services to you or our clients;
- to enable us to provide you with information that we think may be of interest to you; and
- to meet our legal or regulatory obligations.

A more detailed description of how we use information about you is provided below.

Sharing and transferring your information

We may share information about you with some third parties. For more information please see section 6.

We do not transfer information about you to countries outside the UK or the European Economic Area.

Your rights

Your rights under data protection laws include the right to: 1) request copies of your data; 2) request correction of your data; 3) request erasure of your data; 4) object to us processing your data; and 5) ask us to restrict the processing. For more information about your privacy rights see section 12 below.

Contact points

If you have any questions or comments about privacy issues, or wish to exercise any of the rights set out above, please write to Sudeep Dhillon and Anna Morgan or email info@workforcechallenge.com.

In this statement:

“Data Protection Legislation” means the EU General Data Protection Regulation 2016/679; together with all other applicable legislation relating to privacy or data protection (including the UK Data Protection Act 2018).

“Process” means any operation performed on information about you, including to collect, record, organise, structure, store, alter, use, transfer, destroy or otherwise make available.

1. Who this privacy statement applies to and what it covers

This privacy statement applies to Workforce Challenge Partners available at workforcechallenge.com/about-us.

We are committed to protecting your privacy and handling your information openly and transparently.

This privacy statement explains how we will collect, handle, store and protect information about you when:

- providing services to you or our clients;
- performing any other activities that form part of the operation of our business.

In this privacy statement, your information is sometimes called “personal data”. We may also refer to “processing” your data, which includes handling, collecting, protecting and storing it.

2. What personal data we collect

We may collect, record and use your personal data in physical and electronic form, and will hold, use and otherwise process that data in line with the Data Protection Legislation and as set out in this statement.

When we provide services to you or our clients and perform due diligence checks in connection with our services (or discuss possible services we might provide), we will process personal data about you.

We may process your data because:

- you give it to us (for example, provided to us in consultations, coaching sessions, interviews or from surveys);
- other people give it to us (for example, your employer or adviser, or third- party service providers that we use to help operate our business); or
- it is publicly available.

The personal data we process may include your:

- name, gender, age and date of birth;
- contact information, such as address, email, and mobile phone number;
- country of residence;
- lifestyle and social circumstances (for example, your hobbies);
- family circumstances (for example, your marital status and dependents);
- employment and education details (for example, the organisation you work for, your job title and your education details);
- information from feedback questionnaires, competency or psychometric tests;
- information in any complaints you make;
- details of how you use our products and services;
- CCTV footage and other information we collect when you access our premises; and

- details of how you like to interact with us, and other similar information relevant to our relationship.

The personal data we collect may also include so called 'sensitive' or 'special categories' of personal data, such as details about your:

- dietary requirements (for example, when Workforce Challenge Partners would like to provide you with lunch during a meeting);
- health (for example, to facilitate effective coaching); and
- sexual orientation (for example, if you provide us with details of your spouse or partner).

We may also process personal data relating to ethnic or racial origin (for example, any multicultural networks you belong to).

We will typically seek separate permission from you in writing to process these special categories of personal data.

If you choose not to provide, or object to us processing, the information we collect, we may not be able to process your instructions or continue to provide some or all of our services to you or our client.

3. Personal data provided by or about third parties

When our client or another third party gives us personal data about you, we make sure they have complied with the relevant privacy laws and regulations. This may include, for example, that the client or other third party has informed you of the processing, and has obtained any necessary permission for us to process that information as described in this privacy statement.

If any information you give us relates to a third party (such as a spouse, colleague, customer or service user), by providing us with such personal data you confirm that, in line with the above provisions, you have obtained any necessary permission to use it or are otherwise permitted to give it to us.

4. How we use your personal data

We process information about you and/or your business to enable us to provide our services to you or our clients, and to meet our legal or regulatory obligations.

Use of personal data for other activities that form part of the operation of our business

We may also use your personal data in connection with:

- legal or regulatory requirements;
- requests and communications from competent authorities;
- relationship management, which may involve:
 - (a) sending you thought leadership or details of our products and services;
 - (b) contacting you for feedback on services;
 - (c) sending you event invitations; and
 - (d) other marketing or research purposes;
- recruitment and business development, which may involve:
 - (a) the use of testimonials from a client's employees as part of our recruitment and business development materials (with that employee's permission); and
 - (b) the use of third-party data sources to help us verify and improve the information we hold about key business relationships with individuals;
- services we receive from our professional advisors, such as lawyers, accountants and consultants;
- investigating or preventing security incidents; or

- protecting our rights and those of our clients.

5. The legal grounds we use for processing personal data

We are required by law to set out in this privacy statement the legal grounds on which we rely in order to process your personal data. We rely on one or more of the following lawful grounds:

- you have explicitly agreed to us processing your information for a specific reason;
- the processing is necessary to perform the agreement we have with you or to take steps to enter into an agreement with you;
- the processing is necessary for compliance with a legal obligation we have or providing information to a public body or law enforcement agency; or
- the processing is necessary for the purposes of a legitimate interest pursued by us or a third party, which might be:
 - (a) to provide our services to you or our clients and other third parties and ensure that our client engagements are well-managed;
 - (b) to prevent fraud;
 - (c) to protect our business interests;
 - (d) to ensure that complaints are investigated;
 - (e) to evaluate, develop or improve our services or products; or
 - (f) to keep you or our clients informed about relevant products and services and provide you with information, unless you have indicated at any time that you do not wish us to do so.

To the extent that we process any special categories of data relating to you for any of the purposes outlined above, we will do so because:

- you have given us your explicit consent to process that data;
- the processing is necessary to carry out our obligations under employment, social security or social protection law;
- the processing is necessary for health or social care purposes;
- the processing is necessary for public health purposes;
- the processing is necessary for the establishment, exercise or defence of legal claims; or
- you have made the data manifestly public.

Please note that in certain circumstances it may be still lawful for us to continue processing your information even where you have withdrawn your consent, if one of the other legal bases described above is applicable.

6. Sharing your personal data

In connection with any of the purposes outlined in the "How we use your personal data?" section above, we may disclose details about you to:

- competent authorities (including courts and authorities regulating us);
- your employer and/or its advisers, or your advisers;
- credit reference agencies or other organisations that help us make credit decisions and reduce the incidence of fraud; and
- other third parties that reasonably require access to personal data relating to you.

7. Transferring your personal data outside the UK

Information we hold about you will not be transferred to other countries outside the UK or the European Economic Area.

8. Protecting your personal data

We use a range of measures to ensure we keep your personal data secure, accurate and up to date. These include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data to a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti- virus software; and
- physical security measures, to limit access.

The transmission of data over the internet (including by e-mail) is never completely secure. So although we use appropriate measures to try to protect personal data, we cannot guarantee the security of data transmitted to us or by us.

9. How long we keep your personal data for

We seek to ensure that we only keep your personal data for the longest of:

- the period necessary for the relevant activity or services;
- any retention period that is required by law; or
- the period in which litigation or investigations might arise in respect of the services.

10. Your rights

You have various rights in relation to your personal data. In particular, you have a right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;
- be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from where it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data; withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- ask us to stop or start sending you marketing messages at any time by using the contact details in section 12 below; and
- object to our processing of your personal data.

If you would like to access or see a copy of your personal data, you must ask us in writing. We will endeavour to respond within a reasonable period, and in any event within one month in line with Data Protection Legislation. We will comply with our legal obligations as regards your rights as a data subject.

To help us ensure that your information is up to date, let us know if any of your personal details change using the contact details set out in section 12 below.

You may also use the contact details in section 12 below if you wish to make a complaint relating to your privacy.

11. Sending you marketing information

We may use your information from time to time to inform you by letter, telephone, email and other electronic methods about products and services (including those of third parties) that may be of interest to you.

You may, at any time, ask us not to send marketing information to you by following the unsubscribe instructions in communications from us, or contacting us in the way described in section 12 below.

12. Right to complain

If you wish to raise a complaint about how we are using your information, exercise any of the rights set out above, or if you have any questions or comments about privacy issues, you can contact us by:

- writing to Sudeep Dhillon at sudeep@workforcechallenge.com or Anna Morgan at Anna@workforcechallenge.com
- sending an email to info@workforcechallenge.com

You can also complain to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, on 0303 123 1113.

13. Changes to this privacy statement

We may modify or amend this privacy statement from time to time.

When we make changes to this privacy statement, we will amend the revision date at the top of this page. The modified or amended privacy statement will apply from that date. We encourage you to review this statement periodically to remain informed about how we are protecting your information.