

# Fair Processing and Privacy Notice

**Our Fair Processing and Privacy Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR).**

**The Fair Processing and Privacy Notice will become effective from 25 May 2018.**

## 1. Introduction

**1.1** We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information – that includes the personal information we already hold about you now and the further personal information we might collect about you, either from you or from a third party. How we use your personal information will depend on the products and services we provide to you.

**1.2** You can contact the Director, Leanne Lowish regarding Data Protection at any time by emailing [leanne@csa-ap.com](mailto:leanne@csa-ap.com) if you have any questions about how we use your personal information.

**1.3** This Privacy Notice provides up to date information about how we use your personal information and will update any previous information we have given you about using your personal information (also referred to as personal data). We will update this Privacy Notice if we make any significant changes affecting how we use your personal information, and if so we will contact you to let you know about the change.

## 2. About us

We are what is known as the 'controller' of personal information we gather and use. When we say 'we' or 'us' in this Privacy Notice, we mean Our Mana Ltd, also trading as Coaching Supervision Academy (CSA) Asia Pacific and Japan.

## 3. Your privacy rights

**3.1** You have the right to object to how we use your personal information. You also have the right to see what personal information we hold about you. In addition, you can ask us to correct inaccuracies, delete or restrict personal information or to ask for some of your personal information to be provided to someone else. You can make a complaint to us by emailing the Director, Leanne Lowish [leanne@csa-ap.com](mailto:leanne@csa-ap.com)

You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk>.

### 3.2 Right to object:

You can object to our processing of your personal information. Please contact us as noted above, providing details of your objection.

### 3.3 Access to your personal information

You can request access to a copy of your personal information that we hold. You can make a request for access free of charge by contacting the Director, Leanne Lowish [leanne@csa-ap.com](mailto:leanne@csa-ap.com)

### 3.4 Right to withdraw consent

If you have given us your consent to use personal information you can withdraw your consent at any time, and you can update your marketing preferences by contacting the Programme Manager, Sam Fremantle [sam@csa-ap.com](mailto:sam@csa-ap.com) or the Director, Leanne Lowish [leanne@csa-ap.com](mailto:leanne@csa-ap.com)

### 3.5 Rectification

You can ask us to change or complete any inaccurate or incomplete personal information held about you.

### 3.6 Erasure

You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

### 3.7 Portability

You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

### 3.8 Restriction

You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

### 3.9 Make a complaint:

You can make a complaint about how we have used your personal information to us, by contacting the Director, Leanne Lowish [leanne@csa-ap.com](mailto:leanne@csa-ap.com) or to a supervisory authority - for the UK this is the Information Commissioner's Office at [www.ico.com](http://www.ico.com)

We will not make any charge for responding to any request from you to exercise your privacy rights, and we will respond to your requests in accordance with our obligations under data protection law.

## 4. What kinds of personal information we use

**4.1** We use a variety of personal information depending on the products and services we deliver to you. For all products and services, we need to use your name and contact details. For some services we may need your address (for example to send a Certificate) or your bank details (to issue a refund). We might also need health, dietary and other information to facilitate access to services, provide refreshments or to better support our clients.

**4.2** We also use information gathered directly from you as part of services we provide e.g. training courses, retreats, professional development services etc. This information forms part of the requirements of the service we are providing and may be used in accreditation processes, quality standards and certification procedures.

## 5. How we gather your personal information

We obtain personal information directly from you, for example when you fill out an application, agree to services, sign a contract, enquire or complain.

We also gather information from you as part of the services we provide, such as information gathered as part of a learning experience.

We gather information about you, and your progress on courses and training, from others e.g. faculty and peers, during the course of your training.

## 6. How we use your personal information

To provide you with any products and services we need to know your name and contact details. We might also need health information to help support our clients who have a vulnerability.

We sometimes need to gather, use and share additional personal information for specific purposes, which are set out in more detail below.

**6.1** To operate and deliver services to you, including dealing with your complaints and fixing our mistakes, we will use:

- a) your contact details to notify you of essential information and to comply with audit and legal obligations
- b) application form details including personal information
- c) your bank details to process payments and refunds
- d) your professional and career journey
- e) your continuing professional development activities in order to process accreditation
- f) written, verbal and photographic data as evidence of your learning for certification
- g) any special health or mental health information that affects how you might learn or participate in a learning environment
- h) Any other professional or personal interests relevant to your continuing learning journey so that we might send you details of events and opportunities that might interest you (direct marketing) and keep you updated with news (newsletter)
- i) We may need to know the contact details of support staff within your organisation (i.e. Personal assistants) in order to book appointments

## **7. Our legal basis for using your personal information**

**7.1** We only use your personal information where that is permitted by the laws that protect your privacy rights. We only use personal information where:

- a) we have your consent (if consent is needed);
- b) we need to use the information to comply with our legal obligations;
- c) we need to use the information to perform a contract with you; and/or
- d) it is fair to use the personal information either in our interests or someone else's interests, where there is no disadvantage to you – for example, notifying you of a Conference or event being organised by a professional body or other person of interest, or opportunities for you to collaborate with us or others to improve our services.

Where we have your consent, you have the right to withdraw it. We will let you know how to do that at the time we gather your consent.

**7.2** Special protection is given to certain kinds of personal information that is particularly sensitive. This is information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, trade union membership or criminal convictions or allegations. We will only use this kind of personal information where:

- a) we have a legal obligation to do so (for example to protect vulnerable people);
- b) it is necessary for us to do so to protect your vital interests (for example if you have a severe and immediate medical need whilst on our premises);
- c) you have specifically given us explicit consent to use the information for example when you attend an event.

## **8. Sharing your personal information with or getting your personal information from others**

**8.1** We will share your information with others in specific circumstances and we will inform you when we contract with you to provide services, and/or at the time of sharing.

**8.1.2** We will share your information with CSA as CSA holds the EMCC accreditation and ICF credentialing for the course.

**8.1.3** We will share information when it is necessary for progression on a course or event that you are completing with us. This may include sharing with accreditation bodies, moderators and quality standards processes.

## **9. Transfers outside the UK**

**9.1** We may need to transfer your information outside the UK to service providers and regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area, such as the USA. We will inform you if we need to transfer your data outside the UK. For example:

- a) to faculty members residing outside the UK who are involved in your participation on a course, event, webinar, retreat or other service we provide to you.
- b) where the course, event, webinar, retreat or other service we provide to you is being held outside the UK
- c) where essential business services are located outside the UK

Where we need to transfer your data, we will do so with an appropriate level of security.

## **10. How long we keep your personal information for**

**10.1** How long we keep your personal information for depends on the products and services we deliver to you. We will never retain your personal information for any longer than is necessary for the purposes we need to use it for.

**10.2** We keep personal information for one year after any engagement with us.

**10.3** We keep your data for 5 years if you are eligible for accreditation from any Diploma or similar course

**10.4** We will not use your personal information for marketing purposes once you no longer have any active products or services with us.

**10.5** In some circumstances we will hold personal information for longer where necessary for active or potential legal proceedings, to resolve or defend claims, and for the purpose of making remediation payments.

## **11. Keeping you up to date**

**11.1** We will communicate with you about products and services we are delivering using any contact details you have given us - for example by post, email, text message, social media, and notifications on our app or website.

**11.2** Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by emailing the Programme Manager, Sam Fremantle at [sam@csa-ap.com](mailto:sam@csa-ap.com) or the Director, Leanne Lowish at [leanne@csa-ap.com](mailto:leanne@csa-ap.com)

## **12. Your online activities**

**12.1** We use cookies to track your use of our websites (we are currently hosted on the CSA website).

**12.2** A cookie is a small file which is sent to your browser and stored on your computer's hard disc and helps us understand and track your use of our websites and where we can improve the information and services provided. We use cookies solely to gather information on IP addresses, to analyse trends, administer the website, track your movements on the website and gather broad demographic information for aggregate use. For information about blocking the use of cookies, please refer to the instructions/help screen on your internet browser.

### 13. Modern Day Slavery Policy

13.1 The Coaching Supervision Academy Ltd is committed to combatting slavery and human trafficking in its business and supply chains, and we make this statement to assist with compliance with the Modern Slavery Act 2015.

As our business has a turnover of less than £36 million, we do not have a legal obligation to produce a modern slavery statement. However:

- We agree that exploitation within all supply chains ending in the UK is a blight on our society, and we are committed to playing our part in eliminating exploitation;
- We understand that customers with obligations under the Modern Slavery Act 2015 cannot comply with those duties without our cooperation.

To that end, we confirm that we have examined our own business and, to the extent that it is reasonably practicable, businesses within our supply chain and we confirm the following:

- We confirm that within our own business, no relevant offence relating to slavery or human trafficking has been committed.
- We have made enquiries of businesses that supply directly to us and we are confident that no relevant offence is committed in that business.
- Insofar as it was reasonably practicable, we have examined our supply chains and confirm that we found no evidence of slavery or human trafficking.

A more [detailed policy can be found here](#)