

## **PRIVACY POLICY – November 2018**

Welcome to ROBERT YEO LIMITED's privacy policy. ROBERT YEO LIMITED respects your privacy and is committed to protecting your personal data.

### **Who are we?**

We are ROBERT YEO LIMITED, operating as RYLN COACHING, Walpole Road, Twickenham, London TW2 5SN. You can contact us by post at the above address or by email at [privacy@rylncoaching.com](mailto:privacy@rylncoaching.com).

Our website at [www.rylncoaching.com](http://www.rylncoaching.com) provides information on coaching and training services which are aimed at business users – from start-ups and entrepreneurs to larger organisations. This website is not intended for children and we do not knowingly collect data relating to children.

ROBERT YEO LIMITED is company number 11214676 registered in the UK. Our registered office is at 14 Walpole Road, Twickenham, TW2 5SN.

ROBERT YEO LIMITED is the data controller responsible for this website and any handling of personal data carried out by or on behalf of ROBERT YEO LIMITED.

When we mention "we", "us" or "our" in this privacy policy, we are referring to ROBERT YEO LIMITED and RYLN COACHING.

### **What does this Policy cover?**

We at RYLN COACHING take your personal data seriously.

This policy:

- Sets out the types of personal data that we collect about you
- Explains how and why we collect and use your personal data
- Explains how long we keep your personal data for
- Explains when, why and with who we will share your personal data;
- Sets out the legal basis we have for using your personal data;
- Explains the effect of refusing to provide the personal data requested;
- Explains the different rights and choices you have when it comes to your personal data; and

## **What personal data do we collect?**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about our clients as well as visitors to the rylncoaching.com website. This personal data falls into these categories:

- Identity Data includes title and name
- Contact Data includes address, email address and telephone numbers
- Coaching Data includes key information required to provide a coaching engagement such as personal background and career information as well as details relating to your current job, challenges and obstacles being faced, goals and goal related actions.
- Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website, products and services.

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.

## **Where do we collect personal data about you from?**

The following are the different sources we may collect your personal data about you:

Directly from you. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or through chat or social media.

This includes personal data you provide when you:

- sign up to receive the RYLN COACHING blog
- make enquiries or request information be sent to you
- order our services
- become a client and attend coaching sessions
- engage with us on social media



Through publicly available sources. We use the following public sources:

- LinkedIn
- Company Websites
- Corporate Events
- Conference Attendance Lists

### **How and why we use your personal data?**

- Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you enter a coaching engagement.
- Provide you with suggestions and advice on our products and services and how to obtain the most from using our website.
- Where we need to comply with a legal or regulatory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

Generally, we do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example in relation to sending certain direct marketing communications. Where our legal basis is consent, you have the right to withdraw consent any time.

### **How long do we keep your personal data for?**

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any 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.

### **Who do we share your personal data with?**

We may share your personal data with the parties set out below for the purposes set out in this privacy policy:



- Suppliers and service providers (such as accountancy software providers to track invoices and post and courier services);
- auditors and professional advisers like lawyers, accountants and insurers; and
- government, regulators and law enforcement.

We treat the information you provide us with as confidential. We do not sell any personal data on to third parties, and we do not share any personal information about you to others without your permission.

## **What legal basis do we have for using your information?**

### Contractual

When you buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. To carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information. We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### Consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including information on our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies. Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a page on our website.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.



## Legal

Where we need to comply with a legal or regulatory obligation. For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

### **What happens if you do not provide us with the information we request or ask that we stop processing your information?**

If you do not provide the personal data necessary or withdraw your consent for the processing of your personal data, we may not be able to provide coaching or training services.

### **Do We Make Automated Decisions Concerning You?**

No, we do not carry out automated profiling

### **Do we use Cookies to collect personal data on you?**

We do not use cookies for tracking purposes.

### **Do we transfer your data outside the EEA?**

Whenever we transfer your personal data out of the EEA, we will comply with applicable data protection law. Some of the mechanisms we may choose to use when undertaking an international transfer are:

- The transfer of your personal data is to a country that has officially been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (called the “EU Model Clauses”).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. If the

provider is not EU-US Privacy Shield certified, we may use the EU Model Clauses.

## What rights do you have in relation to the data we hold on you?

- 1. The right to be informed**  
You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
- 2. The right of access**  
You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
- 3. The right to rectification**  
You are entitled to have your information corrected if it's inaccurate or incomplete.
- 4. The right to erasure**  
This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- 5. The right to restrict processing**  
You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- 6. The right to data portability**  
You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- 7. The right to object to processing**  
You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
- 8. The right to lodge a complaint**  
You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
- 9. The right to withdraw consent**  
If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive repeated requests
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.

### **How can you contact us?**

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at [privacy@rylncoaching.com](mailto:privacy@rylncoaching.com).

