



## PRIVACY POLICY NOTICE

**Please read the following carefully to understand our practices regarding your personal data and how we will treat it.**

### **Background**

Shared Wisdom Limited appreciates that your privacy is important and that you care about how your personal data is used and shared online. We respect the privacy of everyone who visits our website and uses our online services. We are committed to respecting, securing and protecting your privacy and private data. We are also committed to being transparent about what we collect from you and how we use it. This policy, which covers your use of our website and online services, provides you with information about what personal data we collect, how we use your data, how we ensure your privacy is maintained, and your legal rights relating to your personal data.

#### **1. Who We Are**

1. We are Shared Wisdom Ltd. Our registered office is 82 Whitestone Road, Nuneaton Warwickshire CV11 4SY United Kingdom.
2. You can contact us by:
  1. Telephone – 07973 271184
  2. Email – [rebecca.khanna@oursharedwisdom.org](mailto:rebecca.khanna@oursharedwisdom.org)
  3. Post – Data Protection Officer, 82 Whitestone Road, Nuneaton, Warwickshire CV11 4SY United Kingdom.

#### **2. Your Rights**

1. Under the General Data Protection Regulation (GDPR) and you have a number of rights with regard to your personal data, which this policy and our use of your data has been designed to uphold:
  1. Right to be informed – you have the right to be informed about our collection and use of your personal data.
  2. Right of access – you have the right to request a copy of the information that we hold about you. You can do this by contacting us using the above details.
  3. Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
  4. Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
  5. Right to restriction of processing – where certain conditions apply, you have a right to restrict our processing.
  6. Right of portability – you have the right to have the data we hold about you transferred to another organisation.
  7. Right to object – you have the right to object to certain types of processing (such as direct marketing).
  8. Rights in relation to object to automated processing and profiling – you also have the right not to be subject to legal effects of automated decision making and profiling.

2. If you have cause for complaint about our use of your data, or you would like to exercise any of your rights, then please contact us using the details provided in Section 1 and we will do our best to solve the problem for you.
3. If we are unable to help, or you aren't satisfied with our response, you also have the right to lodge a complaint with the UK's supervisory authority – The Information Commissioner's Office (ICO). The ICO can be contacted:
  1. By post – The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.
  2. By telephone – 0303 123 1113
  3. Via its website – www.ico.org.uk

### **3. What Data Do We Collect From You?**

1. Depending on how you use our site or become a client, we may collect some or all of the following personal data from you (please also see our Cookie Policy).
  1. Contact information such as email addresses, postal address and telephone numbers.
  2. System information, such as IP Address, browser type and version, and operating system.
  3. Information about your activity on our site.
  4. Other publicly available information, including any which you have shared via a public platform such as Twitter or Facebook.

### **4. How We Use Your Data**

1. All personal data is processed and stored securely. We do not keep your personal data for any longer than it is necessary in light of the reason(s) for which it was first collected.
  1. Your personal data will be deleted if we've not had any action with for after 24 months
  2. Where we have a legal obligation to keep it longer than that we will delete it as soon as our legal obligation is discharged.
  3. We may keep your data longer if we are involved in a legal claim or dispute. Where this is the case, we will delete it as soon as such claim or dispute is resolved.
2. Our use of your data will always have a legal basis (as set out in Section 5), and we may use your data for the following purposes:
  1. Providing and managing your access to our website and coaching/consultancy services.
  2. Personalising and tailoring your experience on our website and for coaching/consultancy services.
  3. Providing and managing your account on our website.
  4. Communicating with you (replying to your emails and enquiries).
  5. To provide you with goods and services as ordered.
  6. Market research.
  7. We may use your data to market to you, by email, post or SMS about services you've expressed an interest in. You'll always be able to unsubscribe easily.
  8. Analysing your use of our site and services, gathering feedback, to continually improve our site and your experience.
  9. You will always be able to unsubscribe or opt-out from this use at any time.

### **5. Legal Basis**

1. We will only process your data where we have a legal basis under the GDPR to do so.
2. Our use of your personal data will always have a legal basis, either because:

1. It is necessary for our performance of a contract with you; or
  2. You have consented to our use of your personal data; or
  3. We are complying with a legal obligation; or
  4. It is necessary in pursuit of our legitimate interests – detailed below.
3. Where our processing of your data is based on our legitimate interests, we will have ensured that such processing is necessary, and we will not do so where our interests are over-riden by yours.
  4. Our legitimate interests include:
    1. Selling and supplying our services to customers and potential customers.
    2. Handling customer and potential customer contacts, queries, complaints or disputes.
    3. Understanding our customers' (or potential customers') behaviour, activities, and preferences.
    4. Improving our products and services, including developing new products and services.
    5. Promoting, marketing, and advertising our goods and services.

#### **6. Storing And Sharing Your Data**

1. Data security is very important to us and we take appropriate security measures to safeguard and secure your data which is collected via our website and services.
2. We will never sell or otherwise transfer or disclose your personal data to any third party except:
  1. We may sometimes contract with trusted service providers to provide goods and services on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, marketing and IT systems. This will sometimes necessitate the transfer of your personal data to those trusted service providers.
  2. Where we transfer your data to our trusted service providers, we will have made you aware of the names of these providers in any Agreement for Services with you, as our Client.
  3. In certain limited circumstances we may be legally required to share your personal data – for example where we are involved in legal proceedings, regulatory requirement or government department with appropriate legal authority to compel us to do so.

#### **7. Changes To Our Privacy Notice**

1. We may change this privacy notice from time to time (for example, if the law changes). Any changes will be immediately posted on our site. We recommend you check the privacy notice regularly to remain up to date.
2. This privacy notice was last updated in February 2021.

