

Privacy Policy

We provide coaching and consultancy services in confidence and with integrity. This privacy policy (“Policy”) sets out how Single Step (‘we’) use and protect any information you provide when you use our website or engage with us in relation to our services.

We are committed to ensuring that your privacy is protected, and we comply with the General Data Protection Regulations (GDPR) and laws applicable to the UK.

Should we ask you to provide information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Policy.

We may change this Policy from time to time by updating this page. Please check this page from time to time to ensure that you are happy with any changes.

We process personal data in lawful ways, which have a minimal privacy impact on the data subject, where:

- The data subject has given their consent to the processing
- The processing is necessary for the performance of a contract with the data subject
- The processing is necessary for the compliance with a legal obligation to which the data controller is subject or
- The processing is necessary for legitimate interest reasons of the data controller or a third party

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How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you 'agree', the file is added, and the cookie helps analyse web traffic or lets you know when you visit a site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used, to analyse data about web page traffic and improve our website in order to tailor it for user experience.

Cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

What information do we collect from you?

We use your personal data to manage and administer your account and to keep in contact with you for these purposes. We may collect the following information:

- Name and job title
- Contact information including email address

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- Basic employment details
- Demographic information such as your region
- Information for technical security monitoring purposes such as your IP address and the version of your browser
- Depending on the service we provide to you as an individual or your company, we may also request more detailed information about your employment. For example, the department, function or team you work in, the grade or level of your employment, the length of employment and professional experience and goals

We may collect personal data in the following ways:

- Data disclosed by you directly
- Data disclosed by an authorised third party (e.g. your employer) on your behalf
- Data obtained from a linked system or database
- Data generated through user interaction with our systems and/or services
- Where your data is provided to Single Step by an authorised third party such as your employer (e.g. programme delegate lists), it is the third party's responsibility to ensure they have the correct lawful basis in place to share this data

Why do we collect this information?

We will always tell you how we intend to use your personal data. The main purpose of collecting your personal data is to provide the service you have requested, or we are contracted to provide in relation to your account e.g. executive or individual coaching, leadership or team development.

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We collect this information to understand your needs and provide you with a better service, and for the following reasons:

- Internal record keeping
- We may use the information to improve our products and services
- To contact you in response to a specific enquiry
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided
- From time to time, we may also use your information to contact you for marketing purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the website according to your responses. Where we rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time

Who might we share your information with?

We work with partner coaches, consultants and facilitators and your data may be shared directly with any partner that is directly associated with your account. Any programmes or projects where sensitive information may emerge during the coaching or consultancy is bound and held in strict confidence. The lawful basis for collecting this data is covered under our contract with you. We will not supply your data to third parties for marketing purposes.

How long do we keep hold of your information?

We will hold your data for a maximum of 7 years to meet legal and compliance requirements. We will only keep certain information about employees, clients, suppliers and other individuals or organisations we do

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business with, in order to fulfil business functions.

Employee personal data is held for the duration of the individual's employment and for 7 years after the last day or contracted employment. Where data is held by our partners or third parties, in support of the services we provide to you, they are contractually bound to delete data upon our request, delete data at the end of our contract with them, or to anonymise data after 2 years of receipt.

How can I access the information you hold about me?

The personal data we collect from you or generate from our interactions with you belongs to you. You have the right to know how and why your data is being processed or shared with our partners.

You have the right to ask for a copy of your personal data, to correct, delete or restrict processing of your personal data. You have the right to object to the processing of your personal data in some circumstances, where we don't have to process the data to meet a contractual or legal requirement or where we are using the data for direct marketing.

To contact us about your personal data, please contact the address below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office (ICO).

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Data Breach

We define a data breach as a security incident that has affected the confidentiality, integrity or availability of personal data. If a breach

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occurs, we will establish the likelihood and severity of the resulting risk. If the nature of the breach requires Single Step to inform the ICO, we will do so within 72 hours of becoming aware. Data breach notifications would include: your name and contact details, the date and time of the breach you are reporting, the date and time it was detected and any other information that will help investigate the issue.

Links to other websites

Our website may contain links to other websites of interest. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website, you can choose whether you want the information to be used by anybody for direct marketing purposes. If you do not opt into receiving this communication, we will not share this with you.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us by email, by writing to us or calling us.
- We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so. We may use your personal information to send you promotional information about third

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parties which we think you may find interesting if you tell us that you wish this to happen.

- You may request details of personal information which we hold about you under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018). If you would like a copy of the information held on you, please write to:

Polly Wain
Single Step
19 Grahame Avenue
Pangbourne
RG8 7LF

Your rights

Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. If you have provided consent for the processing of your data you have the right to withdraw that consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn. Single Step is the controller and processor of data for the purposes of the DPA 18 and GDPR. If you have any concerns as to how your data is processed, you can contact Polly Wain at the address above. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 regarding your personal data.