

Within People - Privacy Notice

1. INTRODUCTION

- 1.1. This privacy notice (**Privacy Notice**) sets out the ways in which we, Within People Limited (**we, us, our**), collect and use your personal information in connection with our business, including via our website <https://www.withinpeople.com/> (the **Website**) and our online cultural maturity check tool (the **Survey Tool**) (the Website and the Survey Tool together, the **Services**). It also explains what rights you have in relation to accessing or changing your personal information.
- 1.2. Our Services are not intended for children. We do not knowingly collect or maintain the personal information of children under the age of 18. If you are under the age of 18, please do not access our Services at any time or in any manner. We will take appropriate steps to delete the personal information of persons under the age of 18.

2. ABOUT US

- 2.1. We are a partnership of strategists and coaches registered in England and Wales, under company number 08806790 with our registered address as set out below:

Address: 230 The Circle, Queen Elizabeth Street, London, SE1 2JN

Email: laurie@withinpeople.com

3. PERSONAL INFORMATION WE COLLECT ABOUT YOU

- 3.1. We will collect and process information that you provide to us when you:
 - (a) Make an enquiry, provide feedback, fill in a form online, make a complaint or enter into any other correspondence with us over the phone, by email, or on our website.
 - (b) If you have been provided by your organisation with a link to our Survey Tool, the feedback you provide on the Survey Tool in relation to your organisation.
 - (c) Subscribe to our newsletter and/or mailing lists.
 - (d) Respond to any service questionnaires we may submit to you from time to time.
 - (e) 'Follow', 'like', post to or interact with our social media accounts including Facebook, Instagram, Medium and LinkedIn.
 - (f) Register to and/or attend any events we hold, including where you attend as a presenter.
 - (g) If you are a job applicant, who has submitted a speculative CV/application for a role with us in the future, should one suitable to your skills and experience become available.
 - (h) Use our Services generally. This means that we will collect certain technical information about how you use our Services, and the device that you use to access our Services. This information may include IP address, page views, searches, requests, pre-approvals, confirmations and other actions on the Services, and may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies please read the '**COOKIES**' section below.
- 3.2. The information you provide to us will include (depending on the circumstances):

- (a) **Identity and contact data:** This includes titles, names, addresses, email addresses, phone numbers and date of birth.
- (b) **Service questionnaire data:** If you are using the Services, we might ask you if you would be willing to participate in our questionnaires about the Services, and you may choose to provide us with your feedback about your experience of our Services and details about you.
- (c) **Survey Tool:** If you have been provided by your organisation with a link to our Survey Tool, you may provide information about your experience and/or perception of the culture in your organisation.
- (d) **Photographs and footage:** we may capture images of you if we take photographs of or film an event. Your image may be included in an image or video of the audience at an event or your image may be specifically captured if you are a presenter at the events. We will endeavour to let you know, for example by notices at the events, if we will be photographing or filming. If you do not wish for your image to be used by us, you can let us know by using the contact details at the top of this Privacy Notice.
- (e) **Employment and background data:** If you are submitting a job application you may also provide additional information about your academic and work history, qualifications, skills, projects and research that you are involved in, references, proof of your entitlement to work , National Insurance Number, your passport or other identity document details, your current level of remuneration (including benefits), and any other similar information that you may provide to us.
- (f) **Sensitive personal information:** If you are submitting a job application, you may provide information about your age, race or ethnicity, religious beliefs, social background, sexual orientation, health and whether or not you have any disability, or trade union membership ("**Sensitive Personal Information**"). You may also supply us with Sensitive Personal Information if you are attending an event, for example you may provide information about a disability you may have or any health or dietary conditions.

3.3. In certain circumstances, we will receive information about you from third parties. This will be in the form of:

- (a) **Service providers:** We may collect personal information from our Services' developers, IT support providers, customer service support providers, marketing services providers, survey tool providers, payment services provider (who may be based inside or outside the EU);
- (b) **Services security:** We will collect information from our Services' security partners (who may be based inside or outside the EU) about any misuse to the Services, for instance, the introduction of viruses, Trojans, worms, logic bombs, website attacks or any other material or action that is malicious or harmful.
- (c) **Social media plugins:** We currently use social media plugins from the following service providers who are based both inside and outside the EU: Facebook, LinkedIn, Medium. By providing your social media account details, you are authorising that third-party provider to share with us certain information about you.
- (d) **Clients:** our clients may share personal details, including work contact details, if you are an employee or staff member of one of our clients in connection with the services we are providing to such clients.

- (e) **Employers, recruitment agencies and referees:** If you are a job applicant, we may contact your recruiter, current and former employers and/or referees, who may be based inside or outside the EU, to provide information about you and your application.
- (f) **Publicly available sources:** We currently use publicly available sources, such as Companies House, to carry out identity and compliance checks.
- (g) We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

3.4. Once collected, we use your information for the following purposes:

- (a) **Provide access our Services:** To provide you with access to the Services in a convenient and optimal manner, including sharing your information with the Services hosts and developers.
- (b) **Relationship management:** To manage our relationship with you, which will include notifying you about changes to our terms of use or Privacy Notice, and asking you to leave a review or take an optional service questionnaire.
- (c) **Conduct business with you or your employer:** We use your information to contact you and manage and facilitate our business relationship with you and your employer.
- (d) **Survey Tool:** We use the information you provide via the Survey Tool to provide consultancy services to our clients (the organisation you represent).
- (e) **User and customer support:** To provide users support by dealing with enquiries or complaints about the Services, and share your information with our developers, IT support providers, payment services providers and security providers as necessary to provide the necessary support.
- (f) **Recruitment:** To process any job applications you submit to us, whether directly or via LinkedIn, an agent or recruiter.
- (g) **Marketing:** To keep in contact with you about our news, events, new features, products or services that we believe may interest you, provided that, where necessary, we have the requisite permission to do so, or if it is in our legitimate interests to provide you with marketing communications where we may lawfully do so.
- (h) **Advertising:** to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.
- (i) **Publicity:** to promote our business (i) and events, which may include photographs or film of an event you have attended or participated in; we may use such photographs or films in our printed and online publicity, social media and press releases.
- (j) **Social media interactions:** to interact with users on social media Services including Facebook, LinkedIn, and Instagram, for example, responding to comments and messages, posting, 'retweeting' and 'liking' posts.
- (k) **Research & Analytics:** To carry out aggregated and anonymised research about general engagement with our Services and to use data analytics to improve our website, products/services, marketing, customer relationships and experiences..

- (l) **Compliance with policies, procedures and laws:** To enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors.

3.5. Lawful grounds for using non-sensitive personal information:

We will use your personal information for the purposes listed above on the basis of:

- (a) Performance of your contract with us and the provision of our services to you.
- (b) Your consent (where we request it).
- (c) Our legitimate interests or the legitimate interests of a third party (where appropriate).
- (d) Where we need to comply with a legal or regulatory obligation.

3.6. **Legitimate interests:** Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests do not automatically override yours and we will not use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing, please refer to details of “**YOUR RIGHTS**” in paragraph 10 below.

3.7. Sensitive Personal Information - Lawful grounds for using Sensitive Personal Information:

As indicated in this Privacy Notice, we collect and process Sensitive Personal Information. In addition to the lawful grounds listed above, we must have an additional legal basis to process these types of Sensitive Personal Information. As such, we may process your Sensitive Personal Information:

- (a) with your explicit written consent;
- (b) on the basis of our legal obligations or the exercise of rights in connection with employment, social security and social protection laws;
- (c) on the basis of substantial public interest, such as for equal opportunities monitoring;
- (d) where it is needed in relation to legal claims;
- (e) where it is needed to protect your vital interests, or the vital interests of someone else, and you are not capable of giving your consent;
- (f) where you have already made the information manifestly public; or
- (g) as otherwise legally permitted under data protection laws.

4. WHO WE MIGHT SHARE YOUR INFORMATION WITH

4.1. In connection with the purposes and on the lawful grounds described above, we may share your personal information, when relevant, with third parties such as:

- (a) **Clients:** where relevant, and in connection with the consultancy services we have been engaged to supply to such clients, we may share personal details of employees/staff of the relevant client organisation.

- (b) **Our service providers:** suppliers, business partners and service providers, where they are helping us to market and advertise our services as well as providing our services to you.
- (c) **Design agencies:** design agencies in the UK, USA and South Africa which we may collaborate with on specific client projects.
- (d) **Corporate affiliates:** Other companies of the Within People group based in the UK, USA, and South Africa.
- (e) **Regulators and governmental bodies:** HM Revenue & Customs, regulators, governmental bodies and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
- (f) **Marketing parties:** any selected third party that you consent to our sharing your information with for marketing purposes.
- (g) **Prospective sellers and buyers of our business:** Any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets.
- (h) **Other third parties (including professional advisers):** Any other third parties (including legal or other professional advisors, regulatory authorities, courts, law enforcement agencies and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our staff or where such disclosure may be permitted or required by law.

4.2. We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.

5. COOKIES

5.1. We use cookies to ensure that you get the most out of our Services. Cookies are small amounts of information in the form of text files which we store on the device you use to access our Services. Cookies allow us to monitor your use of the software and simplify your use of Services. The cookies we place on your device may fall into the following categories:

- (a) **Session cookies:** These allow our Services to link your actions during a particular browser session. These expire each time you close your browser and do not remain on your device afterwards.
- (b) **Persistent cookies:** These are stored on your device in between browser sessions. They allow your preferences or actions across the Services to be remembered. These will remain on your device until they expire, or you delete them from your cache.
- (c) **Strictly necessary cookies:** These cookies are essential for you to be able to navigate the Services and use its features. Without these cookies, the services you have asked for could not be provided.
- (d) **Performance cookies:** These cookies collect information about how you use our Services, e.g. which pages you go to most often. These cookies do not collect personally identifiable information about you. All information collected by these cookies is aggregated and anonymous, and is only used to improve how the Services work.

- (e) **Functionality cookies:** These cookies allow the website to remember the choices you make (such as your user name, language, last action and search preferences) and provide enhanced, more personal features. The information collected by these cookies is anonymous and cannot track your browsing activity on other websites.
- (f) If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the Services.

5.2. The names of the cookies used on our Services and the purposes for which these cookies are used are set out in the table below:

Cookie Name	Purpose	Duration
bcookie	This cookie is used to identify the visitor through an application . Th is allows the visitor to login to a website through their LinkedIn application for example.	2 years
crumb	Ensures visitor browsing-security by preventing cross-site request forgery. This cookie is essential for the security of the website and visitor.	Session
language	Saves the user's preferred language on the website.	Session
test	Used to detect if the visitor has accepted the marketing category in the cookie banner. This cookie is necessary for GDPR-compliance of the website.	Persistent
lang	Remembers the user's selected language version of a website	Session
__utm.gif	Google Analytics Tracking Code that logs details about the visitor's browser and computer.	Session
__utma	Collects data on the number of times a user has visited the website as well as dates for the first and most recent visit. Used by Google Analytics.	2 years
__utmb	Registers a timestamp with the exact time of when the user accessed the website. Used by Google Analytic s to calculate the duration of a website visit.	1 day
__utmc	Registers a timestamp with the exact time of when the user leaves the website. Used by Google Analytics to calculate the duration of a website visit.	Session
__utmt	Used to throttle the speed of requests to the server.	1 day
__utmz	Collects data on where the user came from, what search engine was used, what link was clicked and what search term was used. Used by Google Analytics.	6 months
_uv_id	Collects data on the user's visits to the website, such as which pages have been read.	2 years

p.gif	Keeps track of special fonts used on the website for internal analysis. The cookie does not register any visitor data.	Session
slideshare.experiments	Used by SlideShare to determine if the visitor is participating in a design experiment.	Persistent
ss_cvvisit	Contains data on the visit. Collects data such as time spent on the website and website interaction.	1 day
GPS	Registers a unique ID on mobile devices to enable tracking based on geographical GPS location.	1 day
IDE	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.	1 year
images/1x1.gif	Used by the social networking service, LinkedIn, for tracking the use of embedded services.	Session
squarespace-likes	Facilitates the sharing function on the website - The cookie also allows websites to track and target the user with advertisement based on the user's likes and shares.	Persistent
ss_cid	Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient.	2 years
ss_cpvisit	Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient.	2 years
ss_cvr	Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient.	2 years
ss_cvt	Collects data on visitors. This information is used to assign visitors into segments, making website advertisement more efficient.	2 years
test_cookie	Used to check if the user's browser supports cookies.	1 day
UID	Collects information of the user and his/her movement, such as timestamp for visits, most recently loaded pages and IP address. The data is used by the marketing research network, Scorecard Research, to analyse traffic patterns and carry out surveys to help their clients better understand the customer's preferences.	2 years

UIDR	Collects information of the user and his/her movement, such as timestamp for visits, most recently loaded pages and IP address. The data is used by the marketing research network, Scorecard Research, to analyse traffic patterns and carry out surveys to help their clients better understand the customer's preferences.	2 years
VISITOR_INFO1_LIVE	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	179 days
YSC	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
yt-remote-cast-installed	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	Session
yt-remote-connected-devices	Stores the user's video player preferences using embedded YouTube video	Persistent
yt-remote-device-id	Stores the user's video player preferences using embedded YouTube video	Persistent
yt-remote-fast-check-period	Stores the user's video player preferences using embedded YouTube video	Session
yt-remote-session-app	Stores the user's video player preferences using embedded YouTube video	Session
yt-remote-session-name	Stores the user's video player preferences using embedded YouTube video	Session
SS_ANALYTICS_EXPIRATION	Unclassified	Persistent
SS_ANALYTICS_ID	Unclassified	1 year
SS_ANALYTICS_ID	Unclassified	Persistent
SS_HAS_LANDED	Unclassified	Persistent
SS_IS_FIRST_SESSION	Unclassified	Session
SS_SESSION_ID	Unclassified	Session

5.3. Our Services may contain content and links to other sites that are operated by third parties that may also operate cookies. We do not control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the

relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

6. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

- 6.1. We operate a policy of “privacy by design” by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption where appropriate, maintaining a data protection policy for, and delivering data protection training to, our partners and staff, and limiting access to your personal information to those in our company who need to use it in the course of their work.
- 6.2. We will retain your information for as long as is necessary to provide you with the services that you have requested from us, or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do so. Where we have collected the personal information based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent then we will delete your personal information. However, please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

7. INTERNATIONAL TRANSFERS OF YOUR INFORMATION

- 7.1. Our company is located in England. Where we share your personal data within the Within People Group, this may involve a transfer of data outside the UK and/or European Economic Area (EEA) e.g. to our group companies in the USA, and South Africa or to our partners in Canada.
- 7.2. In addition, some of our third party service providers may be based outside the UK and/or EEA so their processing of your personal data will involve a transfer of data outside the UK and/or EEA.
- 7.3. Whenever we transfer your personal data out of the UK or EEA, we will take steps which are reasonably necessary to ensure that adequate safeguards are in place to protect your personal information and to make sure it is treated securely and in accordance with this privacy notice. In these cases, we rely on approved data transfer mechanisms (such as the EU “Standard Contractual Clauses” and the EU-US “Privacy Shield”) to ensure your information is subject to adequate safeguards in the recipient country. If you are located in the UK or the EEA, you may contact us for a copy of the safeguards which we have put in place to protect your personal information and privacy rights in these circumstances

8. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

- 8.1. You have certain rights in relation to your personal information. These include: the right to be informed of the ways in which we use your information (as we seek to do in this Privacy Notice), the right to object to the processing of your information for certain purposes (such as marketing purposes), the right to access your personal information, the right to request that we correct or rectify any information that we hold about you which is out of date or incorrect, to restrict or erase your information (in certain circumstances), or to receive a machine-readable copy of your personal information.

- 8.2. We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions. If you wish to exercise any of these rights, please contact us using the contact details below.
- 8.3. You may also have the right to complain to a data protection authority such as the UK Information Commissioner's Office (<https://ico.org.uk/>) (or relevant authority in your country of residence) if you think we have processed your personal information in a manner which is unlawful or breaches your rights. If you have such concerns we request that you initially contact us (using the contact details below) so that we can investigate, and hopefully resolve, your concerns.

9. THIRD-PARTY LINKS

The Services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

- 10.1. We may make changes to this Privacy Notice from time to time. We will post any changes to our site or notify you of any material changes by e-mail.

This Privacy Notice was updated on 29 May 2020.