

Fair Processing & Privacy Notice

This leaflet 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 Notice is 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 Jo Birch at any time by emailing jo@crucial-difference.org if you have any questions about how we use your personal information.

1.3 This notice provides up to date information about how we use your personal information (also referred to as personal data). We will update this Notice if we make any significant changes affecting how we use your personal information.

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 Notice, we mean Crucial Difference (an initiative of ICRP).

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 Jo Birch jo@crucial-difference.org

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 Jo Birch on jo@crucial-difference.org

3.4 Right to withdraw consent

If you have given us your consent to use personal information, such as in a testimonial, you can withdraw your consent at any time. Contact Jo Birch jo@crucial-difference.org

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.

4. What kinds of personal information we use

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 something in the post) or your bank details (to issue a refund). We might also need relevant health information to ensure we provide suitable access, or cater for dietary needs.



5. How we gather your personal information

We obtain personal information directly from you, for example when you agree to services, sign a contract, enquire or email us.

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 customers who have a vulnerability.

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

- a) In some cases, coaching for example, we may need to know information about your current employment, career, interests etc.
- b) We may need to know the contact details of support staff within your organisation (i.e. Personal assistants) to book appointments
- c) Where applicable, to assist you in your continuing professional development activities in order to process accreditation
- d) 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.



8. Our legal basis for using your personal information

8.1 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;

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.

8.2 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.

9. Sharing your information

9.1 We may share your information when we have explicit consent from you to do so; or where there are legal and ethical grounds to do so such as harm to self or others; or a legal requirement to break confidentiality.

10. Transfers outside the UK

10.1 In some circumstances we may need to transfer your information outside the UK. We will inform you if this is the case.

11. How long we keep your personal information for

11.1 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.

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

We will delete your information within three months of the contract ending unless we have a requirement to do otherwise e.g if you are a child, or if you have asked us in writing, and we have agreed, to keep your information for a specific purpose.

12. Keeping you up to date

12.1 We will communicate with you about 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.

12.2 Where you have given us consent to receive marketing, you can withdraw consent, and update your marketing preferences by emailing Jo Birch jo@crucial-difference.org

13. Your online activities

13.1 We use cookies to track your use of our websites

13.2 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 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.