

## Choose to Grow Ltd – Privacy Policy

May 2018

### **1. Introduction**

At Choose to Grow we base our business on the relationships we create and nurture with our clients and that is why we want to clearly set out when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

### **2. Types of Data we collect**

We primarily collect data in order to inform a relevant audience, which will include existing and potential customers, about our products and services. To this end we will store:

- Contact Name
- Contact Job Title
- Contact Organisation
- Contact Mailing Address
- Contact E-Mail Address
- Contact Telephone Number
- Areas/Products of Interest

We will not collect any sensitive data (e.g. ethnicity, disability status).

If we undertake work for you, we may collect data during the course of this work that is personal to participants. Such information will always be agreed at the time of entering into the contractual arrangement and will not be stored by Choose to Grow following the completion of the work in question.

### **3. How we collect Data**

We maintain a client database, containing the information outlined in section 2, gathered via (although not limited to):

- Enquiries via the Choose to Grow website or directly to Choose to Grow staff members
- Connections with Choose to Grow staff members via LinkedIn
- Enquiries made via Social Media Platforms
- Formal and Informal Networking Events



We do not purchase lists of contacts – clients within our database will have a connection to us that we believe is relevant and reasonable in relation to the material we send them.

#### **4. How we use Data (and our legal basis for doing so)**

Where a client has an existing relationship with us we will use the data held in order to carry out the service we provide. Where the client is a prospective customer, or a past customer not currently contractually engaged with our services, we will use the data held to market and promote products and services that we believe are relevant to that client.

We use the data in this way on the basis of legitimate interest – It is a reasonable and proportionate way of carrying out our core business activities that is targeted at clients that are aligned with our services. We are committed to only providing relevant marketing content to relevant customers.

#### **5. Consent and our approach to “opt-out”**

On the basis of having a legitimate interest, we will not seek express consent from business clients, identified in any of the ways outlined in section 3, to receive communications from us. However, we will clearly offer an opt-out within all our marketing communications which, if enacted, will lead to the client being removed from our records.

We will require express opt-in consent from any non-corporate clients who wish to receive updates on our products and services via personal contact details (personal e-mails, mailing addresses, phone numbers). Such consent can be given via an opt-in form and via our website. Consent can be withdrawn via the opt-out option that exists within our marketing communications.

#### **6. Sharing your Personal Data**

We do not share lists of clients with any other company, or group of companies, for any commercial purpose.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see [MailChimp’s privacy notice](#).

#### **7. Security**

The client database we hold is encrypted and can only be accessed by the Choose to Grow Director and the appointed Data Protection Officer. Choose to Grow staff



commit to the highest standards of data protection and confidentiality within their terms of engagement.

## **8. Retention and Deletion**

We will retain and utilise the client data we hold, in the manner outlined in this document, for a period of 6 months from the date that we originally captured it (or for existing customers a period of 6 months from the end of our last contractual engagement). We will contact potential clients at this point to gain a further opt-in for future communications.

At the point of opt-out, or at the expiry of the 6-month period with no confirmed opt-in, all client records will be permanently deleted and will no longer be used for any purpose.

## **9. Your Rights**

Clients have the right to access and view the data that we hold that relates to them, as well as the aforementioned right to opt-out of our communications and to be removed from (forgotten by) our system. Such requests should be made in writing using the details in section 10.

## **10. Contact**

Choose to Grow L&D Ltd  
Chasewood View Office  
Beamhouse Drive  
Ross on Wye  
HR9 7GR

## **11. Monitoring and Review**

This policy will be reviewed on an annual basis. In the event of any material changes a revised copy will be issued to all clients in our system.