



CHOOSE TO GROW L&D LTD

PRIVACY & COOKIES

POLICY

VOL 3 JANUARY 2020

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.

TERM	DEFINITION/INTERPRETATION
"Account"	An account required to access and/or use certain areas and features of Our Site
"Cookie"	A small text file placed on your computer or device by Our Site when you visit certain parts or access certain features of Our Site
"Our Site"	Refers to www.choosetogrow.co.uk
"UK & EU Law"	Refers to the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended in 2014, 2011, 2015, 2018 and 2019) and the relevant parts of the EU General Data Protection Regulations (Regulation (EU) 2016/679) (GDPR) and the relevant parts of the Data Protection Act 2018 (DPA)

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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.

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3. HOW WE COLLECT DATA

We maintain a client database, containing the information outlined in section 2, gathered via:

- Enquiries via Our Site or directly made to Choose to Grow staff members
- Connections with Choose to Grow staff members or Choose to Grow Business Page via LinkedIn
- Enquiries made via Social Media Platforms
- Formal and Informal Networking Events
- Subscriptions via the appropriate form within Our Site
- 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.

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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. We will utilise your data in the following ways:

- Providing and managing your Account
- Providing and managing your access to Our Site
- Personalising and tailoring your experience on Our Site
- Supplying Our products and services to you
- Personalising and tailoring Our products and services for you
- Responding to communications from you
- Supplying you with email newsletters, alerts etc. that you have subscribed to (you may unsubscribe or opt-out at any time by clicking the relevant link in the email or by contacting us at info@choosetogrow.co.uk)
- Market research
- Analysing your use of Our Site and gathering feedback to enable us to continually improve Our Site and your user experience

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5. CONSENT & 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 our website. Consent can be withdrawn via the opt-out option that exists within our marketing communications.

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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 visit <https://mailchimp.com/legal/privacy/>

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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.

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8. RETENTION & 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 by us for any purpose.

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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 11.

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10. COOKIES

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times. All Cookies used by and on Our Site are used in accordance with current UK and EU Law.

Third Party Cookies

By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. We do not permit or use third party advertisements through our site. However, we do use analytics data provided by Google. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, as detailed below, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

Using Cookies on Our Site

Before Cookies are placed on your computer or device, you will be shown a pop-up to accept them. By confirming the pop-up, you are giving us consent to the placing of Cookies and you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended. You can deny consent by exiting from our website. Certain features of Our Site depend on Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies. You may still block these Cookies by changing your internet browser’s settings, but please be aware that Our Site may not work as intended if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

11. OUR INFORMATION

Our company number is 11152164 and our registered details are: Choose to Grow L&D Ltd, Chasewood View Office, 14 Beamhouse Drive, Ross on Wye, HR9 7GR

Our Data Protection Officer is Philip Carroll and can be contacted on info@choosetogrow.co.uk

Our ICO Registration Number is: ZA580172

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12. MONITORING AND REVIEW

We may change this Privacy Policy as we may deem necessary from time to time, or as may be required by law. Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations.

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