
PRIVACY POLICY

We are 10Eighty Limited (“we”, “us or “our”). This privacy policy explains how we use the personal information we collect when you use our website at <https://10eighty.co.uk> and any of our products or services that link to this privacy policy (collectively referred to as our “**Services**”). It also tells you about your data protection rights and how to contact us or the relevant authorities.

About Us

We are the data controller of personal information we collect about you, or you provide to us, when you use our Services.

10 Eighty Limited is registered in England and wales, company number 7878179, registered office is Ashton House, Hillbrow Road, Esher KT10 9UD, UK.

We are registered as a data controller with the UK Information Commissioner’s office under number Z3280534.

What personal information do we collect?

Personal information, or personal data, is information about you that enables you to be identified.

We may collect, use, store and transfer different kinds of personal information about you as follows:

- Your contact information, including your name, title, address, email address, phone and mobile number and company
- Your employment information, including your age, date of birth, gender and CV information (e.g. employment history, including salary, employer dates and length of service, education history, job profile and current job title)
- Your coaching information, including performance assessments, skills and values assessments, career plans and objectives, coaching notes (including details of coaching interventions, objectives, action points and progress) and your coaching evaluation form
- Technical data, such as the device you are using to access our website, your IP address, operating system and browser type
- Usage data on how you use the website
- Information provided when you correspond with us
- Information you provide when you use any of any of our Services that have interactive features such as message or bulletin boards to create or share content and to message or communicate with others.

How do we collect your information?

Most of the personal information that we process about you is provided to us directly by you including as follows:

- You may give us contact information, and any other information you choose to give to us, by opening an account to use our Services, using our Services or by corresponding with us, filling in on-line forms, providing us with testimonials, registering for or attending our events or webinars or by signing up to receive marketing communications from us
- You may give us information and content when you choose to post messages or communications when you use any of our interactive Service features such as message or bulletin boards
- You may give us employment and coaching information when you use our Services
- You may give us contact and employment information when you apply for a role with us.

When you visit our website, we may collect technical and usage data from you automatically through cookies or similar technology. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information.

Please see our Cookie Policy <https://10eighty.co.uk/cookie-policy/> for details on the cookies we use, why we use them and how you can exercise your choices regarding the cookies we use.

We may also receive personal information about you indirectly in the following scenarios:

- Your employing organisation may provide us with your contact and employment information (such as your name, email address, age, date of birth, date you joined them, length of service with them and job title) to enable us to provide coaching services to you where they have contracted with us to provide coaching services to their employees. Coaching services may include outplacement, career management and other management and leadership development services including coaching, training, webinars and events
- Your organisation may provide us with your contact information if they provide us with products or services, or we provide them with products or services, for customer support, contract administration or billing purposes.

We may collect and process your information for the following purposes:

- If we have contracted with you to provide you with Services: to perform our contract with you, including setting up and maintaining your account with us and providing you with the Services
- If we have contracted with your employing organisation to provide you with coaching Services: for our legitimate business interest of performing our contract with your employing organisation
- For our legitimate business interests of administering and managing our business and our Services, to detect and prevent misuse of our Services, to protect our business, operations and customers and to enforce our contract with you or any other contract to which we may be a party
- To fulfil an obligation to respond to you when you correspond with us by email, in writing or by completing on-line forms
- Your testimonials: for our legitimate business interests of promoting our business, where you have consented to us doing so
- Your technical and usage data: for our legitimate business interests of analysing how you use our website
- Events or webinars that you have registered for or attend: for our legitimate business interests of managing registration and attendance
- Job applications: for our legitimate business interests of processing your application
- Marketing communications: to email you about our products, services and events we think may be of interest to you as necessary for our legitimate business interests of growing our business or to the extent you have provided your prior consent. You can ask us to stop sending you marketing communications at any time by following the opt out links on any marketing message sent to you or by contacting us at any time
- Where we need to comply with a legal or regulatory obligation.

How we may share your information

We may share your information:

- With your employing organisation, if we have contracted with them to provide our coaching services to you and you have consented to us sharing information with them
- With our service providers who provide us with support services to enable us to provide the Services, such as data storage and back up, data diagnostics, email delivery, website hosting and support, IT and system administration and hosting
- With our coaching consultants for the purposes of providing our Services to you and our professional advisors who provide advice in relation to our business operations
- With third parties to whom we may choose to sell, transfer or merge parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business then the new owners may use your personal data in the same way as set out in this policy
- If you use any of our interactive Service features such as message or bulletin boards and you choose to post messages, we may share the information you post to the other users of that Service
- If you have accepted cookies. Please see our Cookie Policy <https://10eighty.co.uk/cookie-policy/> for further details.

If you would like further information about who we have shared your personal information with please contact us as outlined at the end of this policy.

We require our third- party service providers to respect the security of your personal information and to comply with the law. We do not allow them to use your personal information for their own purposes and we only permit them to process the data for the purposes specified above and in accordance with our instructions.

In certain limited circumstances we may share personal data to comply with law, regulation or legal request (including a court order) or if we are involved in legal proceedings.

If your employing organisation provides you with access to any online career management system or diagnostic tools they (not us) will be the data controller of any of your personal data collected by, or you submit to, those systems or tools and their privacy policy (not ours) will apply.

We do not collect or share your payment card details with our payment processor Stripe. If you make a card payment you provide your payment card details directly to them. For information about how they use your personal data please see their privacy notice a <https://stripe.com/gb/privacy>.

International Transfers

Whenever we transfer your personal data out of the European Economic Area, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- The transfer is to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe
- Where we use providers based in the US, we may transfer data to them on the basis of the contractual provisions referred to above, or if they are part of an alternative to the Privacy Shield which has been approved by the European Commission which requires them to provide similar protection to personal data shared between Europe and the US.

Data security and retention

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

Your data protection rights

Under data protection law, you have rights including:

The right to access – You have the right to ask us for copies of your personal information and to check that we are lawfully processing it.

The right to rectification – You have the right to ask us to correct any information you believe is inaccurate. You also have the right to ask us to complete the information you believe is incomplete.

The right to erasure – You have the right to ask us to erase your personal information in certain circumstances.

The right to restrict processing – You have the right to ask us to restrict the processing of your personal information in certain circumstances.

The right to object to processing – You have the right to object to our processing of your personal information in certain circumstances.

The right to data portability – You have the right to ask us to transfer the information you gave us to another organisation, or to you, in certain circumstances.

The right to withdraw consent – You have the right to withdraw your consent at any time where we are relying on your consent to process your personal information. If you withdraw your consent we may not be able to provide certain products or services to you and we will advise you if this is the case.

If you make a request, we have one month to respond to you.

We may need to request specific information from you to help us confirm your identity and your right to access your personal data (or to exercise any other rights). This is a security measure to ensure that personal data is not disclosed to anyone that does not have the right to receive it. We may also contact you to ask you for further information in relation to your request or to speed up our response.

Automatic Decision Making

We do not use automatic decision making or profiling.

Privacy policies of other websites

Our website may contain links to other websites. Our privacy policy applies only to our website. If you click on a link to another website it 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. If you click on a link to another website, we advise you to read their privacy policy.

Changes to our privacy policy

We keep our privacy policy under regular review and place any updates on this web page.

How to contact us

If you have any questions about our privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please contact us by contacting our data privacy manager by email at: Hannah.Moran@10eighty.co.uk; or in writing to: Warnford Court, 29 Throgmorton Street, London EC2N 2AT, UK.

How to contact the appropriate authority

You can also complain to the Information Commissioner's Office (www.ico.org.uk) if you are unhappy with how we have used your personal information.