

## Privacy Policy

### 1. INTRODUCTION

The Centre for Leadership Performance (**CforLP** or **we**) understand that the information you trust us with is important to you, and we are committed to protecting that information and respecting your privacy.

As part of this we are fully committed to complying with the provisions of all applicable Data Protection legislation and regulations such as the Data Protection Act 2018 and UK GDPR.

This Privacy Policy sets out how, when, and why we collect, use, share and retain your personal information, in what situations we may disclose it and how we keep it secure.

The policy covers all brands and activities operated by CforLP including, but not limited to, Cumbria Future Leaders and Primary Business Partnership.

We have appointed a data protection officer and any questions you have in relation to this policy or how we use your personal data should be sent by email to [info@cforlp.org.uk](mailto:info@cforlp.org.uk) or addressed to The Data Protection Officer, Centre for Leadership Performance, Town Hall, Market Street, Cockermouth, Cumbria, CA13 9NP

### 2. ABOUT US

CforLP is based at Town Hall, Market Street, Cockermouth, Cumbria CA13 9NP. For the purposes of data protection law, CforLP will be the controller.

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you personally) will be collected and used by the CforLP (registration no. 7621600 with data controller number Z3481153).

You can contact us in the following ways:

Full name of legal entity: Centre for Leadership Performance

Email address: [info@cforlp.org.uk](mailto:info@cforlp.org.uk)

Postal address: Town Hall, Market Street, Cockermouth, Cumbria CA13 9NP

Telephone number: 01900 824 822.

[www.cforlp.org.uk](http://www.cforlp.org.uk)

Email: [info@cforlp.org.uk](mailto:info@cforlp.org.uk)

Tel: 01900 824 822



### 3. INFORMATION WE COLLECT ABOUT YOU

#### 3.1. Types of Personal Data we collect

We need to collect information about you to offer and deliver our range of services. This can include personal data about you. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, training records, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect use and share certain data held by CforLP such as statistical or demographic data without any personal identifiers, on an aggregate basis, for any purpose. Although this data could be derived from your personal data this is not regarded in law as personal data as it will not directly or indirectly reveal your identity. [See section 7.3](#) for further information on our use of anonymised data.

#### Special categories of personal data

We do not normally collect or store special categories of personal data (such as information relating to health, beliefs or political affiliation) about customers and members. However, there are some situations where we do collect information



regarding to health (e.g. as part of our safeguarding for under 16s when participating in certain CforLP work awareness programmes where we may ask parents to inform us of things such as allergies, mobility issues, conditions requiring extra support etc). In these circumstances, we take extra care to ensure your privacy rights are protected and that the information is only shared with individuals who need to know this as part of the delivery of the programme. If an accident or incident occurs on our property, at one of our events or involving one of our staff then we'll keep a record of this (which may include personal data and sensitive personal data).

### **3.2. How we collect your personal data**

We use different methods to collect data from and about you including:

#### **3.2.1. Personal data you provide**

Primarily this is information we collect directly from you, some automatically. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

#### **3.2.2. Information created by your involvement with CforLP**

Your activities and involvement with CforLP may result in personal data being created. Information collected in these ways may form part of your Profile Data, which could include, details of your login in and passwords when you create an account or how you are progressing with your learning aims whilst on one of our programmes or courses. If you apply to become a volunteer for one of our programmes we will collect and store your personal data which will form part of your Identity and Contact Data.

We also conduct research and analysis on the information we hold, which can in turn generate personal data. For example, by asking for feedback after our events and programmes. We keep a record of your marketing preferences which forms part of your Marketing and Communications Data.

As you interact with our website, we will automatically collect Technical Data and User Data about your equipment, browsing actions and patterns. We collect this



personal data by using cookie, server logs and other similar technologies. [Please see section 12](#) (Cookies and links to other sites) for further details.

### **3.2.3. Information from third parties**

We sometimes receive personal data about individuals from third parties. For example, if we are delivering a piece of work for a company, they may provide us with Identity and Contact Data for the employees who are participating in the programme. We may collect Contact, Financial and Transaction Data from providers of technical, payment and delivery services in the course of transactions with you.

As explained in [section 12](#) (Cookies and links to other sites), we may use third parties to help us conduct research and analysis on personal data (and this can result in new personal data being created).

We may collect information from social media where you have given us permission to do so, or if you post on one of our social media pages.

Occasionally, we may collect information about certain customers (e.g. particularly well known or influential people) from public sources. This could include public databases (such as Companies House), news or other media. We don't do this to everyone, and it is the exception not the rule.

## **4. HOW WE USE YOUR PERSONAL DATA**

### **4.1. Lawful Basis**

We will only use your personal data when the law allows us to. To process your information, we rely mainly on the following legal bases:

- Performance of a contract – the use of your information is necessary to perform a contract that you have with us.
- Legitimate interest – we may use your information for our legitimate interests such as to provide you with the most suitable support, website experience, emails or newsletters, or to improve and promote relevant business services, along with administrative, fraud prevention and detection and legal purposes and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- Consent – we may rely on your consent to use your personal information for certain services or for direct marketing purposes. You may withdraw your consent at any time. Please use the opt-out at the bottom of our emails or contact us using the details provided in [section 2](#) of this policy.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.



## 4.2. Uses of your personal data

Most commonly, we will use your personal data in the following circumstances. We collect and use your personal data to:

- give you information in relation to the CforLP website and other CforLP services such as, but not limited to events, volunteering opportunities and programmes;
- undertake administrative services;
- undertake research and analysis ([see section 7 Research and Profiling](#));
- protect us and you from fraud;
- improve the services we offer;
- report to funders; and
- inform you of other services that may interest you ([see section 6 Marketing](#)).

## 4.3. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSING AND SHARING DATA

We will never sell your data. We will not share personal data with third-party organisations for their marketing purposes without your permission. However, we may disclose your personal information, for example to improve the service that we offer to you or to comply with our legal obligations, in the following circumstances to:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.



- To funders of our services in order to satisfy our reporting obligations.
- To other parts of our business or group.

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

## **6. MARKETING**

### **6.1. What does ‘marketing’ mean?**

Marketing does not just mean offering things for sale, but also includes news and information about:

- our work;
- CforLP benefits and offers;
- our events, activities and local groups;
- products, services and offers (our own, and those of third parties which may interest you);
- taking part in projects;
- ideas and features.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect how we communicate with you in future.

### **6.2. Opt Out**

You can ask us to stop sending you marketing messages at any time by contacting us using any of the following methods:

- clicking the ‘unsubscribe’ option at the bottom of any of our emails;
- emailing [info@cforlp.org.uk](mailto:info@cforlp.org.uk);



- writing to Centre for Leadership Performance, Town Hall, Market Street, Cockermouth CA13 9NP;
- telephoning us on 01900 824822.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

### **6.3. Newsletters**

If you are a member of CforLP local group (for example Cumbria Future Leaders' Forum), you can unsubscribe from general marketing messages but continue to receive your local group's newsletter if you wish.

### **6.4. Social media**

We may use third party provided tools to manage our social media interactions. If you send us a private or direct message via social media the message may be stored by these tools. Like other personal data, these direct messages will not be shared with any other organisations.

## **7. RESEARCH AND PROFILING**

This section explains how and why we may use your Profile Data data to build profiles which enable us to understand our customers, improve our relationship with them, and provide them with a better experience.

### **7.1. Analysis and grouping**

We may analyse our customers to determine common characteristics and preferences. We do this by assessing various types of information including behaviour (e.g. previous responses) or demographic information (e.g. location).

By grouping people together on the basis of common characteristics, we can ensure that group is provided with communications, products, and information which are most important to them. This helps prevent your inbox from filling up, and also means we aren't wasting resources on contacting people with information which isn't relevant to them.

### **7.2. Profiling to help us understand our customers**

We may profile customers in terms of the activities they engage with us in. For example, we keep track of the events, courses or programmes each customer is involved in. This information helps us to ensure communications are relevant and timely.

If, based on information that has been provided to us (such as geographical location, course topics, age), it appears an individual might be interested in a particular



product or service we may contact them to see if they are.

On occasion, we may also combine information about particular customers with external information (such as directorships listed on Companies House, or news about an individual which has featured in the media) in order to create a more detailed profile about a particular individual.

We collect information on preferences and interests (e.g. which courses or events you have attended) so that we know what material you are mostly likely to be interested in.

### **7.3. Anonymised data**

We may aggregate and anonymise personal data so that it can no longer be linked to any particular person. This information can be used for a variety of purposes, such as recruiting new customers, or to identify trends or patterns within our existing customers. This information helps inform our actions and improve our campaigns, products/services and materials.

## **8. YOUNG PEOPLE**

Some of our programmes are specifically designed for young people as we want young people to consider themselves as leaders from a young age. We offer advice and services that are available for teenagers (13-18).

Here's what happens when you use them.

### **Why do we collect information about you in the first place?**

We keep information about you so that we can

- get the right services for you
- plan and improve our services
- keep in touch with you

### **We'll always tell you why we're collecting your personal information**

We'll explain why and how we use it and for how long. It's called a "privacy notice". And if we need your parent or guardian's permission, we'll give you clear details about what's needed at the time.

### **We can only use your personal information if we have a valid reason**

We use your personal information so that we can:

- deliver our services and to provide you with information about them





- deal with your requests, complaints and enquiries
- personalise services and give you things more tailored to your tastes
- understand what kind of services you might use
- recommend things we think might interest you

### **We share personal information about you to others but we follow some rules.**

The main rule is we will never sell your personal information to anyone.

### **When we can contact you**

Sometimes we need to get in touch with you, for example

- to check with you about any service or activity you've signed up for.
- to answer you when you've contacted us, or to respond to a comment or complaint
- for marketing purposes

We'll only contact you when we need to or when you've given us permission.

### **It's safe to use us**

It's our job to keep your personal information safe and secure and we look for the best ways to improve this.

There are also things that you can do to keep safe, like thinking about what information you share and how to keep your devices secure.

### **You're in control of how we use cookies and tracking**

Cookies are small text files that transfer onto your device when you use a service.

We use cookies and tracking to get information about what type of device you're using to access our services and we record things like what sites you visit, your IP address (a unique number your device creates every time you connect to the internet) and to make things easier for you, like remembering your search options or information about you, so you don't have to give it to us again or again, to keep you signed in, even on different devices and to help us personalise our website to you by remembering your preferences and settings.

You can switch off some cookies and similar tracking technologies.



## **You've got privacy rights, the same as adults, so get to know what they are**

You can:

- ask us what personal information we hold about you
- ask us to correct or delete your personal information
- tell us to stop using your personal information

You can do this yourself or you can ask your parent or guardian to do this for you.

### **Information for Parents/Carers**

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children.

If your child has been involved with one of our events or programmes we may use their image (via photo or video) and/or quotes on our website and/or newsletters. We will only do so where we have obtained their prior consent or, if your child is under 18, where you have given your prior permission.

### **9. HOW WE PROTECT DATA**

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to or use or disclosure of your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). We have a Data Protection Policy which personnel are required to follow when handling personal data.

#### **9.1. Payment Security**

All on-line payments are made through Paypal and use their Secure Sockets Layer (SSL) protocol to encrypt the data between your browser and their servers.

CforLP complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council, and will never store card details.

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

#### **9.2. CCTV**

Some of the venues that we use for our events have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and CforLP.



## **10. STORAGE**

### **10.1. Where we store information**

The personal data collected is stored in one or more of CforLP's CRM systems and other appropriate data management systems, both paper based and electronic.

Certain of our external third parties are based outside the UK so their processing of your personal data may involve a transfer of data outside the UK.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

### **10.2. How long we store information**

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored for depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed). On the other hand, sensitive personal information gathered as part of safeguarding under 16s on our work awareness programmes is destroyed immediately after the programme finishes.

We continually review what information we hold and delete what is no longer required. We never store payment card information.

Further information about our retention periods for personal data is contained in our Data Protection Policy, a copy of which can be made available on written request to our data protection officer.

## **11. KEEPING YOU IN CONTROL**

### **11.1. Legal Rights**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows

- the right to confirmation as to whether or not we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a subject access request);



- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason);
- the right to have inaccurate data rectified;
- the right to object to your data being used for marketing or profiling or any other processing where we are relying on a legitimate interest basis for such processing unless we demonstrate compelling grounds which overrides your rights and freedoms;
- the right to request restriction of processing your personal data:
  - if you want us to establish the data's accuracy.
  - where our use of the data is unlawful but you do not want us to erase it.
  - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- the right to request transfer of personal data to you or a third party which we process automatically and which you have provided to us on the basis of your consent or where we have used the information for the performance of a contract. This information will be provided in a common electronic format; and
- the right to withdraw consent at any time where we are relying on consent to process your data.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights or wish to exercise them, please write to our Data Protection Officer at CforLP, Town Hall, Market Street, Cockermouth CA13 9NP or email [info@cforlp.org.uk](mailto:info@cforlp.org.uk).

## **11.2. Fees, Response Time and Additional Information**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of



your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **11.3. Complaints**

You can complain to CforLP directly by contacting our data protection officer using the details set out above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **12. COOKIES AND LINKS TO OTHER SITES**

### **12.1. Why do we use Cookies**

We collect information through the use of cookies and similar technologies to enable us to remember you when you visit our websites and to improve your on and offline experience.

The use of these cookies helps us understand how you use our websites, view our services and respond to our communications activity, so we can tailor communications and enhance our service offering to you.

When you visit our website we may record your device information, including IP address, hardware and software used, general location and when and how you interact with our website.

This information is retained and used to note your interest in our services and improve your experience. When you receive communications emails from us we may use technology or links to determine how you use our direct communications and your interest in it.

### **12.2. About Cookies**

A cookie is a small text file that we store on your browser or hard disk by a web page server if you agree. Cookies contain information that is transferred to your computer's hard drive. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.



### **12.3. Cookies We Use**

We may use both 'session' cookies and 'persistent' cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website. We will use the persistent cookies to enable our website to recognise you when you revisit.

Session cookies will normally be deleted from your computer when you close your browser.

Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. We use these for example to remember your preferences next time you visit our site.

### **12.4. Third Party Cookies**

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).

We use Google AdWords, Facebook, Twitter and LinkedIn remarketing to enable us to deliver targeted adverts across third party web and social media channels. The cookies used do not in any way identify you, your personal information or give us any access to your computer. This allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

More information is available via the links below:

Google <https://www.google.com/policies/technologies/ads/>

Facebook <https://www.facebook.com/business/help/651294705016616>

Twitter

<https://business.twitter.com/en/help/campaign-measurement-and-analytics/conversion-tracking-for-websites.html>

LinkedIn

<https://business.linkedin.com/marketing-solutions/cx/17/06/advertise-on-linkedin>

### **12.5. Managing Cookies**

Most browsers allow you to refuse to accept cookies. This will, however, have a negative impact upon the usability of many websites, including this one. Therefore, please ensure that essential cookies are turned on in your browser.

### **12.6. Links to Third Party Sites**

Where appropriate and only for the legitimate business needs of CforLP, we may



provide links to third party web sites, or advertisements which contain links to third-party sites. These links are provided as a service to you. The linked third party websites are operated by independent entities that have their own privacy policies. This privacy policy does not apply to such other websites or to the use that those entities make of your information. CforLP has no control over the content displayed on such sites, nor over the measures, if any, taken by such sites to protect the privacy of your information.

### **13. CHANGES TO THIS PRIVACY POLICY**

We will amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated on 25<sup>th</sup> April 2022.