

## Forty2 Privacy Statement

### Who are we

This Privacy Notice is provided to you by Forty Two The Performance Company Limited (Forty2). We are a provider of training and development interventions (for more information please see our website: [www.4ty2.co.uk](http://www.4ty2.co.uk)) registered in England (04606980).

### Why do we have a Privacy Statement?

Forty2 respects your privacy and is committed to protecting your personal data. This privacy notice explains how we look after your personal data and tells you about your privacy rights and how the law protects you.

### What information do we process and why?

We process personal information provided to us, either directly or indirectly, to enable us to:

- provide our range of consultancy, training and/or coaching services to you
- promote our services to you
- maintain our own accounts and records

### What information do we collect?

The information we collect includes:

- Information given when you, or your employer register you for one of the services described above, This may include: your name, business address, telephone numbers, email addresses and other contact information, your job title, details of your or your organisation's training needs
- Feedback you have provided on one of our services that you have attended
- Any information that you give to us by volunteering to take part in occasional surveys for marketing or research purposes
- Information of training events you have previously attended or expressed interest in attending

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

### How will we use your information?

1. We will only use your personal data when the law allows us to and most commonly we will use your information for the following purposes:
  - 1.1. to perform and administer the contract we enter into with you, or your employer;
  - 1.2. to enable us to provide you with the courses and services that you, or your employer, have requested from us and to perform our contractual obligations to you;
  - 1.3. to quality assure our services and/or to record details about the programmes attended and/or services used by you from us;
  - 1.4. to provide you with information on courses, products or services that you request from us or which may be of interest to you;
  - 1.5. to notify you about changes to our programmes and services;
  - 1.6. to satisfy and meet our legal and regulatory requirements;

### How will we use your information (cont.)?

2. If you have provided your explicit consent we will also communicate with you about relevant information and opportunities relating to courses and services which we think may be of interest to you. You have the right to withdraw your consent at any time (see paragraph 16). To do so please contact [privacy@4ty2.co.uk](mailto:privacy@4ty2.co.uk). Withdrawing your consent is very likely to impact the services we can provide to you.

### Who might we share information with?

We sometimes need to share the personal information we process with the individual themselves, the individual's employer and our employees. Where this is necessary we are required to comply with all aspects of current data protection legislation and Forty2's Data Protection Policy.

### How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is currently best practice to keep financial records for a minimum period of 6 years to support HMRC audits or provide tax information. In general, we will endeavour to keep data for no longer than is necessary for the purposes for which it is being processed. This means that we will delete it when it is no longer needed.

### What are your rights with respect to your personal data?

- The right to access the personal data we hold on you
  - At any point you can contact us to request the personal data we hold on you as well as why we have that personal data, who has access to the personal data and where we obtained the personal data from. Once we have received your request we will respond within one month
  - There are no fees or charges for the first request but additional requests for the same personal data or requests which are manifestly unfounded or excessive may be subject to an administrative fee
- The right to correct and update the personal data we hold on you
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated
- The right to have your personal data removed/erased
  - If you feel that we should no longer be using your personal data or that we are unlawfully using your personal data, you can request that we erase the personal data we hold
  - When we receive your request, we will confirm whether the personal data has been deleted or the reason why it cannot be deleted (for example because we need it for to comply with a legal obligation).
- The right to object to the processing of your personal data or to restrict it to certain purposes
  - You have the right to request that we stop processing your personal data or ask us to restrict processing. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have a legal obligation to continue to process your data
- The right to data portability
  - You have the right to request that we transfer some of your data to another controller, where processing is being carried out by automated means. Forty2 does not conduct any automated processing and so you will not be able to exercise this right.

## What are your rights with respect to your personal data (cont.)?

- The right to withdraw your consent to the processing at any time for any processing of data to which consent was obtained
  - Where we are relying on your giving express consent to us processing your data, you can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- The right to lodge a complaint with the Information Commissioner's Office
  - You can contact the Information Commissioners Office on 0303 123 1113 or via their website <https://ico.org.uk/global/contact-us/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

## What we ask of you?

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes during your relationship with us.

## Transfer of Data Abroad

Forty2 will not transfer your personal data to any country outside of the UK.

## Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## Changes to this notice

We keep this Privacy Notice under regular review and we will place any updates on our website at <http://www.4ty2.co.uk/contact/>. This Notice was last updated on 25<sup>th</sup> January 2024.

## Contact Details

Please contact us if you have any questions about this Privacy Notice, the personal data we hold about you, how it is processed and/or used, to exercise all relevant rights, or for any queries or complaints at:

Nic Fallan, Forty Two the performance company limited, 93C Aylesbury Road, Aston Clinton, Buckinghamshire. HP22 5AJ.

Email: [info@4ty2.co.uk](mailto:info@4ty2.co.uk).

Phone: 01296 631394

If you have any concerns about our handling of your personal data, you can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.