

## Privacy Notice - Clients

### Introduction

Focal Point Training and Consultancy Ltd (ICO registration **Z7887664**) is a data controller responsible for processing personal data under the Data Protection Act 2018, General Data Protection Regulation (GDPR) (Regulation EU 2016/679) and Data (Use and Access) Act 2025

Our data protection policy, privacy notice and associated procedures have been developed in line with the requirements of the above regulations and UK law.

This privacy notice tells you what to expect when we collect personal information about you.

### 1. Your information

We will often work with consultants who will work with us on the service we are providing to you, as third parties. These third parties are bound by the same confidentiality as an employee of Focal Point Training. The appropriate measures have been taken, in compliance with relevant data protection laws, to make sure these third parties are bound by confidentiality and data privacy laws. When you use our services, you are consenting to our privacy policy and therefore allowing these third parties access to use, process and store your personally identifiable information.

### 2. Information we may collect

We may collect and process personal data about you when you contact us and purchase our training or coaching services or when you are a recipient of our services.

The personal data we may process could include:

- Your name
- Your home or work address, email address and/or phone number
- Your job title, information about job role, personal development and workplace
- Your age, ethnicity, gender, nationality, disability status
- Your occupation, place of work and work history
- Your education and qualifications
- Your payment details, including billing addresses
- Your IP address, operating system and information related to the browser or device you use to access our website, list of URLs starting with a referring site, your activity on our site and the site you exit to
- Any special needs you may have as a learner to allow you to participate in our programmes
- Any other information you provide relating to training and coaching services

### 3. The legal basis for processing your information

We process the personal data listed in paragraph 2 above for the following purposes:

- As required to establish and fulfil a contract with you, for example, if you make and enter into an agreement to receive services from us. This may include verifying your identity, undertaking financial checks, billing and payments, communicating with you and arranging the delivery or other provision of services. We require this information, in order to enter into a contract with you and are unable to do so without it
- To comply with applicable law and regulation
- In accordance with our legitimate interests in protecting Focal Point legitimate business interests and legal rights
- With your consent to respond to any comments or complaints we may receive from you, and/or in accordance with our legitimate interests including to investigate any complaints received from you or from others, about our website or our services
- We may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) products or services for you, in accordance with our legitimate interests
- To monitor use of our website and online services and we may use your information to help us check, improve and protect our products, content, services and website, both online and offline, in accordance with our legitimate interests
- We may also use third parties to undertake credit checks and ensure the validity of billing details in order to prevent fraud, in accordance with our legitimate interests
- To carry out statistical analysis (on an anonymised basis) which may be carried out by us or selected third parties in accordance with our legitimate interests. For example, we may compile statistics about the use of our website, including data on traffic, usage patterns and user numbers. All such data will be anonymised
- To support any special needs from a learning perspective, when you participate in a training or coaching programme with us
- We may also send you electronic direct marketing in relation to our relevant products and services or other products and services provided by us. Electronic direct marketing may be sent, where we believe there is a legitimate interest to provide you with relevant information on our services or where you have given your consent to receive it. You will be able to continue to opt-out of electronic direct marketing at any time by following the instructions in the relevant communication.

### 4. Sharing personal data

We may share your personal data with our support team, facilitators, coaches and trainers for the purposes of administration and to deliver products or services to you.

We may also share your personal data with the below third parties:

- ☑ Our professional advisors such as our auditors and external legal and financial advisors
- ☑ Our suppliers, such as our website provider
- ☑ Third party service providers (such as providers of self-assessment and self-awareness tools) who will process personal data on behalf of Focal Point in order to deliver our products and services

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

In the event that our business or any part of it is sold or integrated with another business, your details may be disclosed to our advisers and those of any prospective purchaser and passed to the new owners of the business.

## **5. Retention of personal data**

We will not keep your personal information for any purpose(s) for longer than is necessary and we will only retain the relevant personal information that is necessary in relation to the purpose. We are also required to retain certain information by law or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.

We operate a retention policy based on our obligations. Please contact us for details outlined in our Data Register.

## **6. Storing personal data**

The personal data that we collect from you may be transferred to and stored outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we do so, the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place. Further information may be obtained from our Finance and Contracts Manager <mailto:dstanfield@focalpointtraining.com>

## **7. Rights in relation to my personal data**

You have the right to request confirmation of whether we process your personal data and to request access to the personal data we hold about you. This is commonly known as a Data Subject Access Request (DSAR).

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we

use to collect your data, clicking the unsubscribe button on any communication we have sent to you or by contacting us at [info@focalpointtraining.com](mailto:info@focalpointtraining.com).

Where you have consented to us using your personal data, you can withdraw that consent at any time.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.

You may restrict our use of cookies on our website. For more information on the cookies we use and how to disable them, please see our use of cookies guidelines <http://www.focalpointtraining.com/cookies/>.

To make a DSAR please email Debbie Stanfield [dstanfield@focalpointtraining.com](mailto:dstanfield@focalpointtraining.com) or phone 01903 732782

We may request proof of identity before fulfilling your request to protect your personal data and the rights of others.

We will respond to valid requests within the timeframes required by applicable data protection law, which is normally within one month of receipt of the request. If we need you to clarify or refine your request or to provide more information, we are able to “stop the clock” on the response timeframe and restart it once we have all the information.

#### **8. Right to complain**

If you have a concern about how we collect, use, or handle your personal data, you have the right to raise a complaint with Focal Point by emailing Debbie Stanfield [dstanfield@focalpointtraining.com](mailto:dstanfield@focalpointtraining.com) or phoning 01903 732782

We will respond within 30 days of receipt, starting the day after the day of receipt (if the last day is on a weekend or public holiday, this is extended to the next working day)

Please see our complaints policy for how we will respond

You can also lodge a complaint with the Information Commissioner's Office (“ICO”) through their website at [ICO Website](#)

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved. (Please see our complaints policy). In some circumstances you can ask us to erase your personal data; if you withdraw your consent, if it is no longer necessary for us to use your personal data, you

object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.

To exercise any of these rights please contact us on 01903 732 782 or [dstanfield@focalpointtraining.com](mailto:dstanfield@focalpointtraining.com)

## **9. Further information**

If you have any queries please contact us on 01903 732 782 or [info@focalpointtraining.com](mailto:info@focalpointtraining.com) or at 3 Brownhill Gardens, Eastleigh Hampshire SO53 2PR.

## **Reviewing the policy**

This policy will be monitored and reviewed annually.