

Introduction

Harper Craven Associates Limited is fully committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we treat personal information in the course of providing our services to our clients and participating individuals.

If you are a client and have an existing contract with us, which includes specific privacy and confidentiality clauses, please be aware that this privacy document does not replace your contract, and should be read in conjunction with it.

This policy contains information on who we are, how and why we collect this data, how we store and protect it, how you can change or erase it, and with whom we share it. It also provides you with our contact details and those of the official body who functions as regulator in these matters.

For the purposes of clarity the GDPR includes the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- The right not to be subjected to automated decision making including profiling.

Who are we?

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), Harper Craven is the 'controller' and 'processor' of personal data gathered during the course of its business to business service provision.

Our registered address is:

Harper Craven Limited

Rocklands Place

Boreham Lane

Wartling

Near Herstmonceux

East Sussex

BN27 1RS

Limited company number: 2398063

Harper Craven is a consultancy providing bespoke training and development programmes, aimed at business and personal development, assessment services and qualifications approved by ILM, which is part of the City & Guilds Group.

It works with trusted 3rd party organisations and individuals, who are GDPR compliant, in the deliver of its bespoke services, which are contracted only with organisations, not individuals or the general public.

Harper Craven has been in successful operation for over 30 years, working with a wide range of business sectors.

Why do we collect personal data?

Because our business provides assessment, training and development of individuals' skills, we need to collect personal data. We are contracted with our clients to provide feedback and information of varying degrees. This may be very simple basic information or more complex assessment reports, dependent upon the contract.

What personal data do we collect?

We may collect and process personal data such as:

- Names
- Email addresses
- Telephone numbers

- Locations of participants
- Gender
- Job titles
- Ethnicity
- Personal action plans
- Coaching reports
- Photographs
- Behavioural data such as 360 degree feedback or psychometric reports

If you visit our Website, we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Information we receive from other sources

We may also receive information about you from your Line Manager or your organisation if relevant and appropriate to the programme or intervention you have been required to attend. All information is kept entirely confidential, through the use of confidentiality agreements and clauses integrated into contracts between your organisation and us. Our trusted 3rd party business partners are also held to the clauses of such agreements, to ensure confidence in our process and delivery of service.

Information about other people

If you provide information to us for the benefit of the programme or intervention about any person other than yourself, such as colleagues or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our 3rd party business partners, to use it.

Sensitive personal data

Such personal data as gender or ethnic origin, which may be considered to be sensitive may be collected in certain circumstances, however is by no means compulsory and will only be collected if you consent explicitly.

How do we use your personal data?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional. On occasion your data will be anonymized and aggregated and retained for research purposes only. You have the right to request that your information is not included.

The following are the lawful basis that Harper Craven operates within:

Contract performance: we may use your personal data to fulfil a contract, which your participation is a part of, or links to our contract with our client:

- to provide the services we have been contracted to perform
- to communicate with you in relation to the provision of the contracted services
- to provide you with administrative support such as support for your personal development, or in completing your qualification or account and relationship management
- to provide you with information and materials pertaining and related to the service we are providing.

Legitimate interests: where this is necessary for purposes, which are in our, or our third parties legitimate interests. These interests are:

- providing you with information and materials necessary to your participation in the programme or intervention
- communicating with you in relation to any issues, complaints, or disputes
- improving the quality of experience when you interact with our products and/or services, including the customer experience of our services and website
- analysis of the performance of our service internally and with our clients of the initiative with which you have been involved, for example.

NOTE: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

Consent: in some occasional circumstances, you may be asked to give express consent to particular activities where you will be involved during the course of the programme or intervention. You have the right to refuse or withdraw your consent.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

Who do we share your personal data with?

To further your personal development, we will share the outputs from the initiative with your HR team, your Line Manager or any other appropriate appointed manager.

We may share your personal data with our trusted 3rd party partners where they are a part of the programme, intervention or contract we have been asked to deliver.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with other trusted third parties including:

- service providers contracted to us in connection with provision of the products and services such as providers of IT services
- professional advisers, consultants, and professional experts;
- analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

How long will you keep your personal data?

As we have on-going business to business client relationships, we will retain your personal data for the duration of the contract, and for an indefinite period following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities. You have the right of course to ask for your data to be erased, or changed and amended at any time.

Where do we store your personal data and how is it protected?

We take all reasonable steps to protect your personal data from loss or destruction. We have technical and organisational procedures in place to deal with any suspected data security breach, and to preserve the security and confidentiality of personal data. We take very seriously the confidentiality of our client relationships and have procedures in place to maintain the quality of these. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. Where you have a username or password (or other identification information) that enables you to access certain services you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to us via the Internet; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there may be exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing some information or if you make unfounded or excessive requests.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or any changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below. Please note that reports such as on line assessment platforms are made anonymous after a defined period. Please also note that it may be necessary to retain your name only for future identification of your request.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is sent to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Right to request no contact

In the event of your being contacted by our sales team you have the right to request the erasure of your details from our telemarketing team activities. There may be a requirement to retain your name only for the purpose of future planning and to ensure that your request is adhered to. Please contact us on the email identified below.

Contact

If you have any queries about this Policy, the way in which we process personal data, or about exercising any of your rights, you may contact us by sending an email to Dataqueries@harpercraven.com or calling 01323 832283 and asking for the Data Controller.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint to the supervisory authority, which is within the UK, The Information Commissioners Office or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Policy

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.