

Rosby Consulting Privacy and Cookie Policy

We respect your privacy and take data security extremely seriously. We make sure we have appropriate security measures in place to prevent your personal data from being accidentally lost and from unauthorised use and access.

Please read this Privacy and Cookie Policy carefully as it explains our practices regarding your personal data and how we will treat it, and the basis on which any personal data will be processed by us.

For the purpose of the applicable data protection legislation (meaning the Data Protection Act 2018 and the General Data Protection Regulation and any legislation which implements it) (the “Data Protection Legislation”), the data controller is Rosby Consulting Limited which has its registered office at 20-22 Wenlock Road, London N1 7GU.

References in this Privacy and Cookies Policy and on our website to “we”, “our” or “us” are references to Rosby Consulting Limited. References to “you” and “your” means each person who interacts with us, uses our website or the products and services we provide.

1 Information we collect and process about you

1.1 We may collect and process the following personal data about you:

- 1.1.1 Information you give to us. You may give us information about you when you use our website, www.rosbyconsulting.com (“our website”), or by communicating with us in person, by phone, email or otherwise. This also includes information you provide if you use any of our services (whether as part of the service we provide to your employer (or prospective employer) or otherwise), participate in any surveys, and when you give us any feedback or report a problem with our website. The information you give us may include your name, address, email address, phone number, date of birth, job title and company information. If you pay us directly for any services then we may also ask you for financial information, such as payment card details. Sometimes you may also choose to provide us with certain information about the nature of your employment, issues you may have with that and details around your physical and mental health in connection with that. Please also note section 1.1.7 below if you have any coaching sessions with us.
- 1.1.2 Information we collect about you when you communicate with us in person, by phone, email, post, or otherwise, and when you use our services (whether as part of the service we provide to your employer (or prospective employer) or otherwise). We collect information such as how and when you contacted us and responded to communications from us and about how and when you use our services.
- 1.1.3 Information we collect about you if you use our website or interact with us over the internet, including via social media. Each time you visit our website or interact with us we may automatically collect the following information: (a) technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; (b) information about your visit, including the full Uniform Resource Locators (URL); products you viewed or searched for; length of visits

to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs).

- 1.1.4 Information we collect about you from publicly available sources. This may include information available from social media (depending on your settings and the applicable privacy policies) and information from resources such as Companies House.
 - 1.1.5 Information we receive from other sources. We may receive further information about you if you use any of the services we provide. We work closely with your employer (or prospective employer) and third parties (including, for example, suppliers and service providers) and may receive information about you from them. We may combine information we receive from these other sources with information you give to us and information we collect about you.
 - 1.1.6 We may monitor or record communications between you and us and we may keep a copy of any correspondence.
 - 1.1.7 Information you give to us about you when you participate in coaching sessions. Coaching sessions will often be in person, but may from time to time include coaching over the phone or by email. This section will apply in all those circumstances. The nature of coaching sessions means that it is very likely that you will provide us with certain information about issues you may have with your employment, as well as outside of work, in a personal capacity. It may also include sensitive data, such as details around your physical and mental health if you agree to share this with us. We take the confidentiality and security of this information particularly seriously and will explain this to you at the start of your first coaching sessions.
- 1.2 We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data, but it is not considered personal data under the Data Protection Legislation as it does not directly or indirectly identify you. If at any time we do combine any aggregated data with your personal data so that it can identify you, we treat the combined data as personal data, which we will use and process in accordance with this Privacy and Cookies Policy.

2 Cookies

- 2.1 We and our service providers collect information about your use of our website from cookies. A cookie is a small file which asks permission to be placed on your computer's hard drive. Once it is it helps analyse website traffic or lets us know when you visit a particular site. Cookies allow website applications to respond to you as an individual. The website application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 2.2 We use traffic log cookies to identify which of our website pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system.
- 2.3 Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your

computer or any information about you, other than the data you choose to share with us.

- 2.4 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

3 Purposes and legal basis for using your personal data

- 3.1 Where you have requested that we provide a specific service to you, or you otherwise make use of those services, we will process your personal data in order to perform our contract with you and provide that service.

3.2 We also use the personal data we hold about you to pursue our legitimate interests in providing and marketing our services to you and/or your employer (or prospective employer), improving our website, services and interactions with you and your employer (or prospective employer) and other users of our services in the following ways:

- 3.2.1 administer your and your employer's (or prospective employer's) account and relationship with us and to, communicate with you in person or by telephone, mail, email, text (SMS) message, instant messaging or other electronic means;
- 3.2.2 provide you with information about the services that you request from us;
- 3.2.3 provide you with information about other services we offer that are similar to those that you have already received or enquired about;
- 3.2.4 provide you with information about services we feel may interest you or be best for you;
- 3.2.5 notify you about changes to our services;
- 3.2.6 ensure that content from our website is presented in the most effective manner for you and your device;
- 3.2.7 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 3.2.8 to build up a picture of your interests so that you don't miss information relevant to you when you visit our website;
- 3.2.9 to improve the service we offer you and/or your employer (or prospective employer) and to try and ensure that you get the best from our website;
- 3.2.10 to allow you to participate in interactive features of our website and services;
- 3.2.11 as part of our efforts to keep our website safe and secure;
- 3.2.12 to measure the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- 3.2.13 to send direct marketing to you (see section 5, below);
- 3.2.14 to make suggestions and recommendations about products or services that we think may be of interest based on your use of our services and your usage patterns both on our website and on other channels (such as email and social media);
- 3.2.15 for training and quality purposes;
- 3.2.16 to check any instructions you give to us and for the purposes of investigating any complaint you may make, or as evidence in any dispute or anticipated disputes between you and us.

- 3.3 In some cases we may also use the personal data we hold about you to comply with our legal obligations, or enter into or perform a contract with you.
- 3.4 Where you have agreed to share sensitive data with us in a coaching session then the legal basis for us processing that data is consent. You can withdraw that consent at any time by contacting us at bernadette@rosbyconsulting.com.

4 Who your data can be disclosed to

- 4.1 We may need to disclose your data to others to ensure the effective provision to you of the services and information you request. Your data may also be disclosed to the other entities as described in the clauses below.
- 4.2 We may share your information with selected third parties including:
- 4.2.1 Suppliers, service providers, business partners and sub-contractors;
 - 4.2.2 Analytics and search engine providers that assist us in the improvement and optimisation of our website;
 - 4.2.3 IT and software providers who supply us with our IT infrastructure for the provision of our services and administering our business (including our internal and external communications) and who also help us manage our customer and contact databases, customer relationships and marketing.
- 4.3 We may disclose your personal information to third parties if:
- 4.3.1 we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - 4.3.2 Rosby Consulting Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
 - 4.3.3 we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with you and other agreements; or to protect the rights, property, or safety of our business, our customers, or others.
- 4.4 We review all our relationships with third parties carefully so that we can be sure as possible that their practices match our own commitments to you relating to privacy and security. We also comply with the Data Protection Legislation in our dealings with these third parties to ensure that your information is appropriately protected.
- 4.5 We take particular care in relation to any sensitive data that you may share with us in coaching sessions and fully respect our ethical responsibilities regarding “client confidentiality.” Please note that we will not share this information with your employer unless you consent to us doing so.

5 Direct marketing and how you can change your preference

- 5.1 We may send direct marketing communications to you, including by email, telephone or SMS or mail. If we are required by law to have your consent to do this then we will only do so if we have that consent.
- 5.2 Whenever you receive direct marketing from us you will be told how you can unsubscribe so that you no longer receive it. When we communicate with you via email you will also be given the opportunity to set or amend any preferences that you have indicated to us.
- 5.3 You are also able at any time to withdraw that consent to receive marketing communications that you have given to us. You can do this at any time by contacting us at bernadette@rosbyconsulting.com. Sometimes we may need to contact you further to ask you for additional information so that we can comply with your request.

6 Where we store and transfer your data

- 6.1 We store your electronic information on our secure hard disks and servers in the UK or on password protected devices. Any hard copy information is stored securely or if being transported is kept in an individual's personal possession.
- 6.2 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 data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use appropriate procedures and security features to try to prevent unauthorised access, loss or damage.

7 How long we keep your information for

- 7.1 How long we keep your information will depend on the purpose for which we use it. We will only retain your information for as long as is necessary for the purposes set out in this Privacy and Cookies Policy and as is necessary to comply with our legal obligations. We do not keep more information than we need for the particular purpose.
- 7.2 Where we have provided you with a service we may keep an archived record of your personal data for a period of up to 6 years after termination (unless a longer period is prescribed by law) for the purposes of responding to legal disputes and legal or regulatory enquiries or investigations only, but will not use this data for any other purpose.
- 7.3 If you ask us to stop sending direct marketing communications to you, we will keep the minimum amount of information necessary (such as your name and email address) to ensure that we are able to adhere to your request.

8 Third party websites

- 8.1 Our website may contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any

responsibility or liability for these websites or their policies. Please check these policies before you submit any personal data to these websites.

9 Your rights

- 9.1 Under the Data Protection Legislation, you have certain rights in respect of the personal data we hold about you. These may include rights to: request a copy of the personal data that we hold, request that we correct personal data if it is inaccurate, request that we erase or block your personal data, and to object to our processing of your personal data. These rights are limited in some situations. For example, if we have a legal requirement or a compelling legitimate ground we may continue to process your data even where you request its deletion.
- 9.2 If you would like to exercise any of these rights, please contact us using the details in the Contact section below.
- 9.3 You also have the right to make a complaint if you feel your personal data has been mishandled. We would encourage you to contact us in the first instance but you are also entitled to complain directly to the Information Commissioner's Office (ICO) (if you are in the UK), or to your local data protection authority (if you are outside the UK).

10 Changes to our privacy and cookie policy

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

11 Contact

- 11.1 Questions, comments and requests regarding this Privacy and Cookie Policy should be addressed to bernadette@rosbyconsulting.com.