

GDPR Privacy Policy

1. Scope

- 1.1 The Data Protection Act 2018 controls how your personal information is used by organisations, businesses or the government. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). The GDPR's aim is primarily to give control to individuals over personal data. The regulation clarifies and confirms that GDPR is enforced and action will be taken by the Government if a breach of GDPR is not adhered to.
- 1.2 This Policy sets out the obligations of PSFI LLP, a Limited Liability Partnership registered in England and Wales with the Partnership Number OC439907, whose registered office is at 6 Cobden Court, Wimpole Close, Bromley, England, BR2 9JF ("PSFI" "We" "Us" "Our") regarding retention of personal data collected, held, and processed by PSFI in accordance with the General Data Protection Regulation ("GDPR").
- 1.3 PSFI will follow the Data Protection Act (2018) and GDPR requirements to ensure that business operations are to the highest standards.

Purpose of the Privacy Policy

- 1.4 This Privacy Policy explains how we use the personal information we collect from you or that you provide to us.
- 1.5 By visiting our website (www.psfi.org) and engaging with us to carry out services you are accepting and consenting to the practices described in this policy.

2. Elements of the Privacy policy- Data Collection

- 2.1 What information do we collect about you?
 - 2.1.1 If you engage us to carry out services for you, we will gather personal information from you such as your name, address, telephone numbers and email address. We will also gather information relating to your organisation and your requirements. These requirements may mean we need to collect personal information about other employees from your organisation.
 - 2.1.2 This information is obtained from you through PSFI forms you may complete, discussions with you, letters and emails.
- 2.2 Why do we need to collect and use your personal data?
 - 2.2.1 The main legal basis specifically allowed for under the General Data Protection Regulation ("GDPR"), for processing your data is for the proper performance of our contract with you. The information we collect is essential for us to be able to carry out the services you require from us effectively. We cannot, for example, provide a bespoke leadership development programme without the full relevant information on the participants.

- 2.3** Where is your information processed?
- 2.3.1** All your information is processed either in the UK or Germany with adequate measures to ensure it is suitably protected. If in future it were to be processed elsewhere in the European Union, you should know that all EU countries are also bound by the GDPR.
- 2.4** With whom might we share your information?
- 2.4.1** We will not share your information for marketing purposes with any other organisations. To deliver our services to you effectively we may share relevant details with approved third parties that we engage for specialised delivery on our education programmes, such as to perform psychometric assessments. In such a case we will have contracted with them to ensure that the nature and purpose of the processing is clear, that they are subject to a duty of confidentiality, and they will only act in accordance with our written instructions.
- 2.5** How do we protect your information?
- 2.5.1** We have strict controls in place to help protect personal information (held both physically in paper form and electronically) and to minimize loss or damage whether through accident, negligence or deliberate actions. We are currently pursuing Cyber Essentials Accreditation to demonstrate this.
- 2.6** How long do we keep hold of your information?
- 2.6.1** We will keep your personal data for as long as you are a client of PSFI. Should your relationship with PSFI end, we will only retain personal information that we are legally obliged to keep for the relevant time period. We are subject to regulatory requirements to keep data for specific minimum periods. We reserve the right to keep data for longer periods than this due to the possibility that it may be required to defend a future complaint against us by you or any third-party representative; or it may be required to help you defend yourself in an enquiry from HMRC or for other personal reasons.
- 2.6.2** You have the right to request the deletion of your personal data. We will comply with this request subject to the restrictions of our contractual and legal requirements or legitimate interests as described above.
- 2.7** What rights do I have?
- 2.7.1** Under GDPR, you have the following rights as data subjects:
- 2.7.1.1** Right to be informed – about the collection and use of your data, which is a purpose of this Privacy Policy document;
- 2.7.1.2** Right of access – to your personal information. If you would like to receive a copy of the personal information we hold for you, you may make a Subject Access Request to our Data Controller (see below);

- 2.7.1.3** Right to rectification – if the data we hold is inaccurate or incomplete. You can ask for information to be removed if there is no compelling reason for PSFI to continue to have it;
- 2.7.1.4** Right to restrict processing – if you request to block the processing of personal information for specific reasons;
- 2.7.1.5** Right to data portability – for your own purposes in certain circumstances;
- 2.7.1.6** Right to object – to PSFI processing your data inappropriately.

3. Cookies

- 3.1** Cookies are small pieces of data, stored in text files, which are stored on your computer or other device when websites are loaded in a browser. They are widely used to ‘remember’ you and your preferences, either for a single visit (through a ‘session cookie’) or for multiple repeat visits (using a ‘persistent cookie’). Cookies may be set by the site that you are visiting (known as ‘first party cookies’), or by other websites who serve up content on that site (‘third party cookies’).
- 3.2** We use some third-party cookies to help us understand how visitors use our site and what interests them. However, we do not collect or store any data that can personally identify the visitor to our site. If you would like more information about the specific cookies, we use please contact the Data Protection Officer (DPO), Dan Johnson, dan.johnson@psfi.org
- 3.3** For more information about cookies generally visit: www.allaboutcookies.org

4. What can I do if I have a complaint about how my personal data is processed?

- 4.1** Protecting your personal information is important to us. If you are unhappy with how we have handled your information we would encourage you first to contact the Data Protection Officer to see if the complaint can be resolved amicably.
- 4.2** You have a right to lodge a complaint with the supervisory authority for data protection.
 - 4.2.1** In the UK, this is the ICO:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Telephone: +44 (0) 0303 123 1113

5. Contact details

- 5.1** How can I contact you?
 - 5.1.1** If you have any questions about our Privacy Policy or information, we hold about you, please get in touch:
 - 5.1.2** By email – Dan Johnson, dan.johnson@psfi.org

5.1.3 By telephone – +44 (0)20 3252 3000

5.1.4 In writing – Data Protection Officer, 6 Cobden Court, Wimpole Close, Bromley, London, BR2 9JF

6. Policy Review and Implementation

- 6.1** This Policy will be updated as necessary to reflect current best practice, official guidance, and in line with current legislation.
- 6.2** All questions, concerns, and other feedback relating to this Policy should be communicated to the Managing Partner or a Board member, info@psfi.org
- 6.3** This Policy shall be deemed effective as of 1st January 2022. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

7. Policy Approval

This Policy has been approved and authorised by the Board:

A handwritten signature in black ink, appearing to read 'HM', on a light-colored background.

Signed by:

Name: Dr Henry Marsden

Position: Managing Partner

The latest review of this policy was on: 1st April 2023