

Privacy policy

Impact Development Training Ltd including its subsidiaries and branches (“Impact”) respects the privacy of every individual who visits our website, contacts us and works with us. We are committed to safeguarding your privacy and have written the following privacy notice to explain what information we collect, and what we do with it.

This policy may change from time to time so please check it periodically. It was last updated on 10th August 2020.

Who are we?

Impact Development Training Ltd is the parent company for a number of subsidiaries. Please find the full list below. Impact Development Training Ltd is registered at the same address as Impact (UK) Ltd, which are our company headquarters.

The websites within the scope of this policy are:

www.impactinternational.com

air.impactinternational.com

Registered name	Registered address	Company number
Impact (UK) Ltd	Cragwood House Windermere Cumbria LA23 1LQ	8880486
Impact International ASPAC Region Co., Ltd.	10th Floor, Alma Link Building No. 25 Soi Chidlom Ploenchit Road Lumpini Pathumwan Bangkok 10330 Thailand	105550108975



IMPACT

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Impact Development Training Ltd.

Impact Development Training Limited	Progue Pty Ltd Suite 407 12 Century Cct Norwest NSW Australia	086 228 284
IMPACT INTERNATIONAL CO., LTD.	Room 1005 No. 28, Xuanhua Road Changning District Shanghai China	310000400591149
Impact APAC (Hong Kong) Limited	FLAT/RM E 18/F Rich View Terrace 26 Square Street Sheung Wan Hong Kong	1322224
Impact Italia S.r.l.	Via Merulana, 248 00185 Roma Italia	10971441000
Impact (Japan) Limited	1-6-12 Yoyogi Shibuya-ku Tokyo	0110-01-033899
Impact Development Training Limited	186 Ladies Mile Ellerslie Auckland New Zealand	926325
Impact Polska sp. Z.o.o.	Ul. Batalionu Miotla 20 01-366 Warszawa Poland	0000122553
Impact Singapore PTE LTD	1 North Bridge Road # 19-09 High Street Centre Singapore 179094	200711616D

Impact Learning & Development Inc.	18 West Putnam Avenue Greenwich CT 06830 USA	043655794
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If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at datasecurity@impactinternational.com

Who is the data controller and processor?

For the purposes of the personal data covered in this privacy notice, Impact could be a 'Data Controller' or a 'Data Processor'.

How do we obtain your personal information?

We have listed the ways we are likely to collect your personal information, according to the relationship you have with us. We may obtain your personal information in a variety of ways, including:

Clients, suppliers and other business contacts:

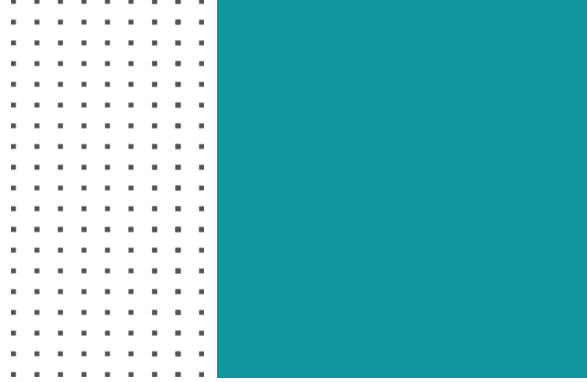
- From data you supply whilst working together during commissioned services, or during new business activities and the act of commissioning new work.
- From inbound enquiries to info@impactinternational.com, and other email inboxes such as individual email accounts of Impact employees.
- From inbound phone calls where we see the incoming phone number and you pass us information verbally.
- From networking activities and events, for example exchanging business cards or connecting on LinkedIn.
- From recommendations or references about you from others.
- From you signing up to our mailing list via our website or Facebook page.
- From contact and conversations with our suppliers.

Recruitment candidates:

- From data collected from you when you apply to us for employment either online, by post or via an agency, and during any subsequent interactions as part of the recruitment process.

Website visitors:

- From visits to our websites and when resources are accessed on our websites and other platforms and technologies made available by us. We may automatically collect Technical Data and Usage Data. We may collect this data via cookies including, where available, your IP address, operating system and browser type, for system administration.

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- From website data capture forms, for example event applications and booking forms or pdf downloads.

Participants in our solutions:

- From you being a participant on one of our contracted solutions. Data is initially collected from your associated organisation. Data may also be collected from you before, during or after a solution, related to providing the contracted solution or collecting evaluation data about the solution.

Any information you give us should be accurate, and if you are supplying anyone else's data you must ensure that you have the authority and legal basis to do so.

What personal information is processed?

We have listed the types of personal information we may process, according to the relationship you have with us. We may process different types of information about you, which may include:

Clients, suppliers and other business contacts:

- Name
- Email address
- Phone number
- Job title
- Manager's name
- Business name and address

Recruitment candidates:

- Name
- Home address
- Email address
- Phone number
- Employment history
- Education and qualifications
- Other information that you provide

Website visitors:

- Technical data, including IP address, browser type and version, operating system
- Information about how you use the website
- Any information you supply to us through forms on the website, which may include:
 - Name
 - Email address
 - Phone number

- Job title
- Business name and address
- Country

Participants in our solutions:

- Name
- Email address
- Phone number
- Job title
- Manager's name
- Business name and address
- Emergency contact information
- Responses and results of assessment tools, including both Impact assessment tools and third-party assessment tools, such as MBTI assessments

We may also collect the following special category data if you are a participant in one of our solutions:

- Dietary requirements
- Medical information, including medication, injuries and conditions
- Any other special needs that we may need to be aware of for the purpose of providing our Services to you

How is your personal information used and what is our legal basis?

The table below shows how your personal information may be used (the purpose) and in each case what the legal basis is. Where legitimate interest is the legal basis, we identify what our legitimate interests are.

Purpose	Legal basis for processing
Clients, suppliers <ul style="list-style-type: none"> ● Communicating with you as a client or supplier, about new or currently commissioned projects. ● Performing financial tasks, such as raising and sending invoices. ● Communicating with you whilst we provide services to you as a client. ● Communicating with you with regards to an event you have applied to attend or have attended (e.g. sending 	Contractual fulfilment

<p>you logistical information about the event or sending you related follow-up content).</p>	
<p>Clients, prospective clients, business contacts</p> <ul style="list-style-type: none"> • Responding to enquiries about our Services that you have sent to us. • Registering you and managing our relationship. • Contacting you to ascertain interest in our Services. • Sending you e-newsletters and other relevant content regarding our Services via email, if you have signed up to our mailing list. • Communicating with you on LinkedIn, for example sharing relevant content or inviting you to industry events. • Communicating with you regarding any previously agreed marketing activity such as the production of a case study, video or entering an industry award. • Enabling you to participate in surveys. • Communicating with you with regards to an enquiry you submitted through the website. 	<p>Legitimate interest</p> <ul style="list-style-type: none"> • Sending you marketing communications and proposals for working together. • Growing our business and informing our marketing strategy. • Conducting research and product development to improve our Services for the benefit of our clients and others. • Keeping our records updated. • For good governance, accounting, and managing and auditing our business operations.
<p>Website visitors</p> <ul style="list-style-type: none"> • Ensuring the security and functionality of our website. 	<p>Legitimate interest</p> <ul style="list-style-type: none"> • Keeping our website updated and relevant, to develop our business and to inform our marketing strategy.
<p>Recruitment candidates</p> <ul style="list-style-type: none"> • Responding to recruitment enquiries and progressing the recruitment process, storing your details for future reference if new positions become available. 	<p>Legitimate interest</p> <ul style="list-style-type: none"> • Providing employment.
<p>Participants</p> <ul style="list-style-type: none"> • Providing the service contracted by your organisation. • Communicating with you whilst we provide services to you as a participant. 	<p>Contractual fulfilment</p>

<p>Participants – assessment tool data</p> <ul style="list-style-type: none"> • Providing the service contracted by your organisation by employing assessment tools. 	<p>In general, the legal basis is contractual fulfilment. In some cases, we may rely on consent.</p>
<p>Participants – special category data:</p> <ul style="list-style-type: none"> • Ensuring your health and safety during a solution we are providing you. 	<p>Protecting your vital interests</p>

Who is your information shared with?

Your personal data will not be sold or disclosed to anyone outside of Impact or Impact’s Group of companies, or appointed suppliers, without obtaining your prior consent – unless we are required to do so by law.

Retention of your personal information

Our data retention policy is to hold data for three years after the end of the last interaction between us, this includes attendance of one of our programmes, or after a software licence expires. In some cases, we may be legally required to retain the data for a longer or shorter length of time.

In the case of assessment tool data, this is held for 18 months.

Your rights

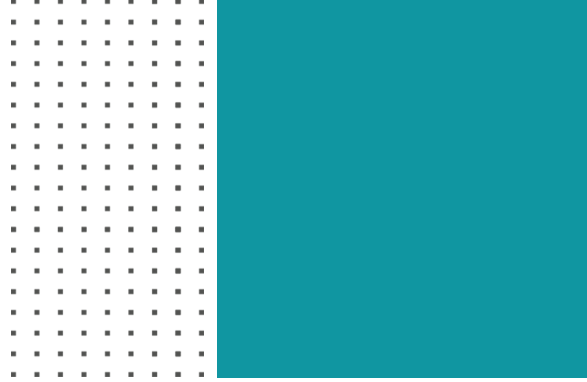
As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email datasecurity@impactinternational.com. Your rights are as follows:

- The right to be informed

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- The right of access

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

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- a) The purposes of the processing.
 - b) The categories of personal data concerned.
 - c) The recipients to whom the personal data has been disclosed.
 - d) The retention period or envisioned retention period for that personal data.
 - e) When personal data has been collected from a third party, the source of the personal data.

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- The right to rectification

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- The right to erasure (the 'right to be forgotten')

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

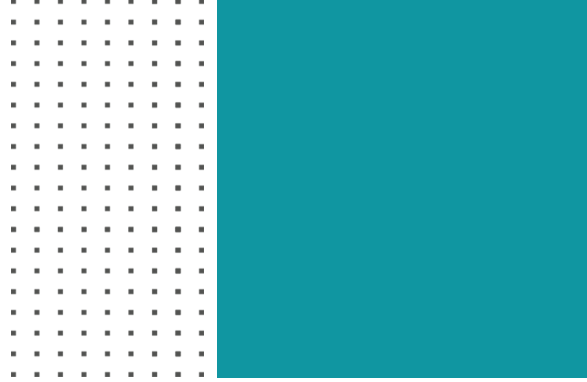
- The right to restrict processing

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested.
- b) Processing of the personal data is unlawful.
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process.
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

- The right to data portability

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the



original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- The right to object

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest.
- Processing is for the purpose of direct marketing.
- Processing is for the purposes of scientific or historic research.
- Processing involves automated decision-making and profiling.

Where we are a processor in respect of your personal data, we will inform the relevant controller of your request and assist and co-operate with the controller for them to fulfil the request.

How we protect your information

We take a range of organisational and technical measures to protect your information.

We maintain strict physical, electronic and administrative safeguards to protect your personal data from unauthorised or inappropriate access. Where appropriate we use industry-standard encryption techniques. Regular security reviews are held by Impact to ensure that our systems and processes remain safe and secure for the protection of your personal data.

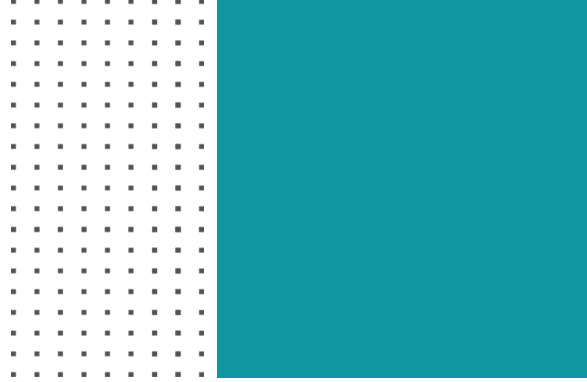
Logging Personal Data online

If you access our Services or information about our Services online, we collect information that your browser sends to us automatically.

This information is sometimes known as log data and may include information about your computer's unique IP (Internet Protocol) address, together with details of the version of the browser you are using, the pages of any of our website that you visited, the time and date of those visits and the time you spent looking at each page. Retaining this data helps us improve our online presence and thereby improve our Services.

Cookies

Cookies are computer files containing small amounts of data that are gathered by websites which you visit when you are browsing online. They identify you anonymously, but when taken together with other sources of information, it is possible that some information contained in cookies might constitute personal data under GDPR. Cookies are sent to your browser from any website that you visit and are stored on your hard drive.



You will normally have the ability to disable cookies. However, you should be aware that if you disable cookies, it may impact on the functionality of the website and you may not be able to access all parts of the website or the Services.

Third Party Service Providers

From time to time, we may employ or engage third parties to help us deliver part of our Services, to deliver activities which are related to our Services or to help us analyse how our Services are being used and accessed. Where our requirements are such that we need to disclose personal data to these third-party service providers so that they can carry out their tasks, in accordance with their agreement, we will make sure that we comply with the provisions of the GDPR as regards data security.

Changes to this Privacy Statement

We may update this privacy statement from time to time to reflect changes in law or changes in our data protection regime. Any changes will usually be effective immediately that an updated version of this privacy statement is issued.

Contact Us

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at datasecurity@impactinternational.com

