



## PRIVACY POLICY

### Policy Statement

Sticky Change (which includes Sticky Change Ltd, Sticky Change Consultants and Sticky Change Partners) is committed to ensuring that your privacy is protected. This **Privacy Policy** ('Policy') sets out how Sticky Change ('we', 'us', 'our') uses and protects any personal data that users ('you') provide, or that we collect from you in the course of our everyday business activities.

Sticky Change only collects, uses and shares personal information (information by which an individual can be identified) to perform its business activities and to provide customer services; primarily the provision of organisational development consultancy, and training and executive coaching. Sticky Change does not carry out automated decision making or profiling.

By providing your personal information to Sticky Change, you agree that this **Privacy Policy** will apply to how we handle your personal information and you consent to us collecting, using and sharing your personal information as detailed in this Policy. This includes consent to us using and disclosing your personal sensitive information for the purpose for which it was collected (as stated above), unless we subsequently receive your written consent to use it for another purpose. Such consent will be requested by authorised representatives of Sticky Change only.

If you do not agree with any part of this Policy you must not provide your personal information, or the personal information of others to us. Please note if you do not provide us with your personal information, or if you withdraw the original consent you provided under this Policy, then this may affect our ability to provide services to you, or negatively impact the services we provide to you.

### **Sticky Change Data Handling Practices as defined by this Privacy Policy**

#### **1. Personal data handling and the law**

Personal information has the meaning given to it under your local data protection law. There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Policy. Where this occurs we will adjust our information handling practices in your jurisdiction to comply with the local data protection laws. This Policy outlines Sticky Change's information handling practices and managing your privacy in reference to the EU General Data Protection Regulations (GDPR) which comes into legal effect on the 25<sup>th</sup> May 2018.

We will only process your personal information where:

- You have given your consent to such processing by voluntarily providing us with your personal information, which you can withdraw at any time, by you in writing.
- The processing is necessary to provide our services to you.
- The processing is necessary for compliance with our legal obligations.
- The processing is necessary for our legitimate interests, or those of any third party recipients that receive your personal information.

## **2. Information which we may collect from you**

Sticky Change typically collect the following types of personal information:

- Contact name, email, address and phone number.
- Personality profiles.
- Personal responses to questionnaires.
- Dietary requirements, special requests and /or health issues (if any) for those attending training events.
- Personal feedback forms from services provided.

You may choose to share your personal data with us by making an online enquiry, or by sending us an email, completing a survey, or by providing your details by letter, or by telephone. This may include subscribing to any of our services; requesting newsletters, obtaining downloads, registering for events and online webinars, contacting us through social media channels or accounting and administration (business to business).

- If you contact us we may keep a record of that correspondence and we may retain details of your visits to the website including, but not limited to, traffic data, location data, weblogs and other communication data and a record of the resources you access.
- We may keep a record of your website preferences and interests, other information relevant to customer surveys, offers made by us and details of the transactions you complete through the website and the fulfilment of your orders.

## **3. Use of your information**

Sticky Change will typically

- use your personal information to contact you in relation to a business communication or enquiry.
- store your contact data so we can provide you with other Sticky Change products and services that you may be interested in.
- contact you ask you to complete surveys that we use for research purposes or training, although you do not have to respond to these. (Noting: you have the option to unsubscribe from these communications at any time).

#### **4. Location of your information**

Sticky Change have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, associates and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

#### **5. Disclosure of your information**

Sticky Change may share your personal information with any member of any Sticky Change business.

Sticky Change will disclose your personal information if 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 our terms and conditions of use, or to protect the rights, property, or safety of Sticky Change, our customers or others. This includes exchanging information with other companies and organisations for the purpose of fraud protection and credit risk reduction, or to comply with UK Government laws and regulations.

#### **6. Controlling your personal information**

Sticky Change will

- make every effort to maintain the accuracy and completeness of your personal information. However you can assist us by contacting us if there are changes to your personal information, or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from inaccurate, inauthentic, deficient, or incomplete personal information that you, or a person acting on your behalf provides to us.
- respond to any contact from you, if you believe that any information we are holding about you is incorrect or incomplete and require it to be amended, or if you would like a copy of the data we hold for you, or would like to request the removal of your information from our records.

**Please contact the company's Data Protection Officer Fiona Cameron (fiona@stickychange.com), or write to the Data Protection Officer using the following address; Sticky Change, The Mill House, Llangwm, Monmouthshire NP15 1HQ.**

You can at any time tell us not to send you marketing communications by email by using the contact information above, or by clicking on the unsubscribe link within the marketing emails you may receive from us.

## **7. Security**

Sticky Change is committed to ensuring that your information is secure. We have reasonable security measures in place in order to protect your personal information from unauthorised access, use, alteration and disclosure.

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 site. Any transmission is at your own risk.

Once your information is received it is managed in line with recognised industry security good practice to safeguard it as best we can, but we cannot guarantee that the security measures we have in place will never be defeated or fail, or that such measures will always be sufficient or effective.

Please note:

- Your personal information will only be seen by those who have a legitimate reason for seeing it.
- We do not collect, access, store or process any payment information on our websites.

## **8. Links to other websites and social media platforms**

Our websites and the communications you receive from Sticky Change may contain links to other websites of interest. If you use these links please be aware that we do not have any control over that other website and therefore we cannot be held responsible for the protection and privacy of any information which you provide whilst visiting such sites. Such sites are not governed by this Policy. Please exercise caution and look at the privacy policy applicable to the website in question.

Your interactions with Social Media platforms and us are governed by the privacy policy of the third party company providing them.

Sticky Change LinkedIn. Please refer to their privacy policies before you utilise their services.

## 9. IP addresses

When you access our website, open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer and which are generally assigned when you access the internet. We may use IP addresses for system administration, investigation of security issues, and compiling data regarding use of our website, including the completion of webforms and downloads, and / or mobile applications.

## 10. Cookies

A cookie is a small file which asks permission to be placed on your computer records. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

## 11. How we use cookies

Cookies on our website are used for a variety of different purposes, but generally speaking their use breaks down into the following categories:

### ***Strictly Necessary Cookies:***

These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

### ***Analytical/Performance Cookies:***

These allow us to recognise and count the number of users of our website and see how such users navigate through our website. This helps to improve how our website works, for example, by ensuring that users can find what they are looking for easily. We use Google Analytics to gain insight into how this website is used, and can access information on the most visited pages on our website, the geographical locations of our visitors, time spent on the website and the number of times a link has been clicked, amongst many other useful statistics. The information provided by Google Analytics does not allow us to identify individual users.

## 12. Removing & Managing Cookies

To ensure that you are in control of your privacy at all times, all web browsers give you the option to disable cookies. For up to date, step-by-step instructions on how to control or delete cookies, please [visit this site](#).