

M-SQUARED LIMITED PRIVACY POLICY

1. INTRODUCTION

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union.

This Privacy Statement applies to the processing by M-Squared of your personal data in accordance with GDPR. M-Squared takes your privacy very seriously and treats all your personal data with great care. M-Squared acts in accordance with the applicable data protection legislation.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by M-Squared. It also states which rights you have under applicable data protection legislation.

PARTICULARLY IMPORTANT INFORMATION

WHO WE ARE: For the purpose of applicable data protection legislation, the data controller of your personal data is Mark Miller, M-Squared, 40 Bramcote Road Nottingham NG9 1DW.

2. COLLECTING YOUR PERSONAL DATA

We collect information about you in the following ways.

Information you give to us. This includes personal data collected:

- Through our Website when you register, login, commence or complete an online transaction to use our products and services.
- When your company has booked you onto one of our events.
- When we do business with you, which will usually include:
 - Contact details including names, telephone and email details.



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- If you have special requirements then it may on occasions also be necessary to collect details about diet or disability or any other preferences that you may have.
- We may also collect your birthdate and address for some certified training services we provide, for example ILM (Institute of Leadership & Management) training courses.

Information Automatically Collected. This includes information and personal data collected:

- Through our Website. We automatically log information about you and your computer or mobile device when you access our Website. The information about your use of the Website comprises http header information which your browser transmits to our webserver, information collected through the use of cookies and log information. For example, when visiting Website, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, the website you visited before browsing to our Website, pages you viewed, how long you spent on a page, access times and information about your use of and actions on Website.

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

We use the information we collect about you to process your training bookings, answer your queries, and provide further training information relevant to the topics you are involved with. With your consent, we will contact you via our marketing and sales channels (email/ phone/ post) about other related products and services we, or our group business, provide which we think may be of interest to you. Our marketing communications are generally sent by email but we may sometimes use other methods of delivery such as by post or SMS.



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We mainly collect, store and process personal data when requested to do so by the company you work for who purchases our training services. In addition we may store name and email contact details for people connected to us via LinkedIn.

4. SHARING YOUR DATA

We may share your personal data as follows:

- **Third Parties Designated by You.** We may share your personal data with third parties where you have provided your consent to do so.
- **Our Third Party Service Providers.** We may share your personal data with our third party service providers who provide services such as payment processing, information technology and related infrastructure provision, business support (operational and administrative), customer service, the processing and delivery of marketing communications to you, email delivery, auditing and other similar services. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data. Third parties are subject to confidentiality obligations and may only use your personal data to perform the necessary functions and not for other purposes.
- **Affiliates.** We may share some or all of your personal data with our affiliates, in which case we will require our affiliates to comply with this Privacy Statement. In particular, you may let us share personal data with our affiliates where you wish to receive marketing communications from them.
- **Corporate Restructuring.** We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.
- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful



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requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

- We Never Sell Personal Information We will never sell your Personal Information to any third party.

We do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any business external to our group for their own marketing purposes. From the data we collect, you should only ever receive communications from our own brand.

5. YOUR RIGHTS

The GDPR provides the following rights for individuals:

Reviewing, Correcting and Removing Your Personal
Information

Summary: You have the following data protection rights:

- You can request access, correction, updates or deletion of your personal information. You can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.



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You have the right to complain to a data protection authority about our collection and use of your personal information.

Right to revoke consent

If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

Right of access to your information

If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by sending an email to our data controller at mark@goodfoot.co.uk. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

Right to rectification and erasure of data, and restriction of processing

If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by sending an email to mark@goodfoot.co.uk

Right to data portability

You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

Right to object

You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. Furthermore, you have the



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right to object at any time to our processing of your personal data for direct marketing purposes or to profiling. You can do this by either (i) opting out by using the option we provide in the relevant direct marketing message (e.g. an email newsletter), or (ii) by sending an email to mark@goodfoot.co.uk or (iii) writing to:

Mark Miller, M-Squared, 1 Barclay House, 6-8 The Square, Kenilworth CV8 1EB

For the sake of clarity: without prejudice to the foregoing we are at all times entitled to send you messages that do not constitute direct marketing, i.e. service messages.

General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law.

We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may either (i) charge you a fee, or (ii) refuse to process your request. With respect to access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

6. PROTECTION AND STORAGE OF YOUR DATA

We have used and will continue to use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be encrypted and stored on a virtual private server that is secured by means of state of the art protection measures. A strictly limited amount of people have access to your personal data.



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We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. COOKIES

The Website uses various cookies. We may track and record your use of our online services, either through cookies or via other means. Cookies enable us and others to monitor your browsing behaviour. Information generated by the use of cookies may constitute personal data. We may use the personal data collected in this manner for the purposes as stipulated in this Privacy Statement.

8. RETENTION OF INFORMATION

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement. This may be up to 4 years, unless a longer retention period is required or permitted by law.

Should you choose to unsubscribe from our mailing list, please note that your personal data may still be retained on our database to the extent permitted by law.

9. GENERAL

We are committed to resolve any complaints about our collection or use of your personal data. In case you have any questions in relation to this Privacy Statement or our practices in relation to your personal data you may send an email to mark@goodfoot.co.uk. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.



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We have done our best to make sure that this Privacy Statement explains the way in which we process your personal data, and rights you have in relation thereto. We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information.

10. CLIENT RELATIONSHIP

Our working relationship with you is paramount to us. We commit to dealing with you in an honest and open manner, and would gratefully receive any suggestions from you for improvements or enhancements to our services, processes and systems.

