

INNER ARMOUR TRAINING LIMITED PRIVACY NOTICE
THIRD PARTIES
MARCH 2021

PLEASE READ THIS NOTICE CAREFULLY. IT CONTAINS IMPORTANT INFORMATION ABOUT HOW WE PROCESS YOUR PERSONAL INFORMATION.

WHO WE ARE AND HOW WE APPROACH DATA PRIVACY

We are Inner Armour Training Limited Company Registration No. 12121673 Registered Office: Barttelot Court, Barttelot Road, Horsham, West Sussex, United Kingdom, RH12 1DQ

We are the Data Controller for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) retained in the UK under the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419) and known as the UK GDPR.

As a company we are committed to protecting and respecting the privacy of your personal information. We want you to be confident that your information will be properly protected whilst in our possession.

This notice explains how we, and carefully selected third parties we work with, will collect and use the personal information of our customers, suppliers, prospects, ex-employees, and users of our websites. If this describes you, please read this notice carefully and make sure you're comfortable with the content.

If you have any questions about our use of your personal information, or you wish to exercise one of your rights under data protection legislation, please contact us. A summary of your rights is detailed in this notice.

OUR WEBSITE AND OUR APP

This notice details how we use information you provide to us, including through the "Contact Us" function on our website and our app, referred to in this notice as our **Site and also when you download our App**.

The Sites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Unfortunately, the transmission of information through the internet is never completely secure. Although we do our best to protect your personal data at all times, we cannot guarantee the security of the data you send to us through our Sites. Any transmission made is therefore at your own risk. Once we have received your information we use strict procedures and security features to protect against unauthorised access.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate business interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message You have the right to withdraw consent to these activities at any time by contacting us at enquiries@innerarmour.org

INFORMATION WE COLLECT FROM YOU AND THE PURPOSES FOR WHICH WE WILL USE IT

We hope the following table helps you to understand what information we may collect, in what circumstances and how we use that information (including how long we retain it for). Your personal information shall not be stored any longer than is necessary for the purposes set out below.

Category of information	Where it comes from	What is collected and how we use that information	How long we will keep it for
Information you give to us (Voluntary information from direct interactions)	This is information you give to us about you by:		
	<ul style="list-style-type: none"> Downloading our App or applying for, or purchasing, our products or services, including processing and delivering your order 	Email Address Username Licensing Code Training Code It is necessary for us to obtain and process this information in order to enter into, and perform, our contract with you to provide our products and services.	7 years
	<ul style="list-style-type: none"> Contacting us with an enquiry or to report a problem with our products, services or our Sites. 	In order to process your enquiry and/or investigate a problem we may ask you to provide contact information (name, address, telephone number, email and address. We will only use your personal information to investigate and respond to you with the outcome of your enquiry/our investigation. You do not have to provide this information to us, it is entirely voluntary. However, we may be limited in our ability to respond to you if contact information is not provided. We will only correspond with you in the way you have asked us to. It is in our legitimate business interests to process this information in order to deal with your enquiry/investigate the problem you've raised. We'll ensure your rights are protected.	6 months Access to this information will be restricted on a "need to know" basis.
<ul style="list-style-type: none"> Business contact information. 	We will keep: <ul style="list-style-type: none"> a record of business contacts of our suppliers, advisers, agents and clients and their contact information in order to manage our commercial relationship with that third party and perform contractual obligations (i.e. it 	7 years	

		<p>is necessary for us to perform a contract);</p> <ul style="list-style-type: none"> • a record of contacts from competent authorities and regulators linked to our industry, together with their contact information, in order to comply with a legal obligation; and • a record of prospective business contacts. This is in our legitimate business interests (i.e. we have a justifiable reason for processing information in this way). 	
	<ul style="list-style-type: none"> • Being a former employee or worker of ours 	<p>We will retain your personal data after your employment or engagement in accordance with our separate Privacy Notice for Employees and Workers. Please contact us at enquiries@innerarmour.org if you would like a copy of this Privacy Notice. It is also available on our website.</p>	<p>As set out in our Privacy Notice for Employees and Workers.</p>
	<ul style="list-style-type: none"> • Health information 	<p>We collect sensitive personal data, known as 'special category personal data' in the form of the health information we collect when you access and register to our service via the app.</p> <p>The health information we collect includes notes on the coaching sessions which must be destroyed in person or digitally, more information below:</p> <p>Licensed coaches will be processing health data during any conversations that happen via the App and you will also collect health information when users sign up to the App. This is because users will be referred to the app where they may be feeling suicidal or struggling, and this constitutes special category data. Some examples, special category data includes the following types of data:</p> <ul style="list-style-type: none"> Racial or ethnic origin Political opinions Genetic data Biometric data Health information Personal and Relationship information <p>The ICO guidance is that you must keep records where you process special category data, however you must also comply with your duty to keep the data for no longer than is necessary. Therefore we suggest to keep the notes</p>	<p>[0 Years]</p>

		<p>whilst you are still following up with the particular end user to ensure continuity and then once the relationship has ended, you must destroy the notes.</p> <p>We rely on your consent to legally collect and process this sensitive personal data for the purposes of assisting you with any query received via the app. We only collect from you the minimum health information necessary for this purpose.</p>	
<p>Information we collect about you and your device (automated technologies or interactions)</p>	<p>Each time you visit our website we will automatically collect the following information:</p> <ul style="list-style-type: none"> • technical information, including your operating system, the browser you use (Device Information); • details of your use of our website including traffic data, the resources you use, where you have clicked through to our website from that of a third party, the domain name of the connecting website (Log Information); 	<p>Some online identifiers (such as static IP addresses) are your personal information.</p> <p>We collect Device Information so that we can ensure adequate technical support for our website and ensure it is functioning properly on all operating systems/browsers. We want to ensure the content of our website is being presented to you in the most appropriate way to ensure it is easy to use/navigate. We also need this information in order to allow you to participate in interactive features on the website where you chose to do so.</p> <p>We collect Log Information so that we can better understand how our website is used and improve its functionality/content. We want to provide you with a customised service.</p> <p>Your Device Information and Log Information will be combined with that of our other users and reported back to our advertisers in statistical form. It will not be possible to identify you from this aggregated information.</p> <p>These activities are in our legitimate business interests (i.e. we have a justifiable reason for processing your information in this way).</p> <p>We use cookies and pixel tags on our Site to collect standard internet usage information and to track visitor behaviour in order to personalise and enhance your experience with us:</p> <ul style="list-style-type: none"> • a cookie is a small text file sent to your computer or device; • a pixel tag is an invisible tag placed on certain parts of our 	<p>[1 year]</p>

		<p>Site. It does not leave a footprint on your computer/device.</p> <p>Pixel tags and cookies work together to tailor the Site.</p> <p>You can manage this automatic collection of data by adjusting your cookie settings. More information can be found at http://www.allaboutcookies.org/</p> <p>We rely on the lawful basis of consent to process your personal information using non-essential cookies or other similar technologies. We rely on the lawful basis of legitimate business interests for processing your personal information using essential cookies.</p>	
<p>Information we receive from third parties (Third Party Information)</p>	<p>We do not work closely with third parties currently and will update this if it changes.</p>	<p>Recruiters:</p> <p>Not yet applicable.</p> <p>We carefully select the third parties we work with to ensure they handle your personal information in line with our standards and those required by law.</p>	

Do I have to provide this information?

In most cases the personal information you provide to us in the table above is entirely voluntary. You are not under a statutory or contractual obligation to provide it to us.

However, where we need to collect personal data under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

PROVIDING US WITH PERSONAL INFORMATION OF ANOTHER PERSON

If you need to provide us with personal information about another person you must obtain that individual's **express consent** to pass us their information. You should share this notice with those individuals as it may also apply to them.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your personal data to form a view on what we think you may want or need, or what may be of

interest to you, including email reminders of our service and useful newsletters containing psychological defence information. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing. We will rely on our legitimate business interests or consent to process this information.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Inner Armour Training Ltd for marketing purposes.

Unsubscribe

You can ask us or third parties to stop sending you marketing messages at any time by logging into their website and adjusting your marketing preferences or by following the unsubscribe links on any marketing message sent to you or by emailing us at enquiries@innerarmour.org at any time.

Where you unsubscribe we will still process your personal data to fulfil service purchase you make, to register a warranty or other transactions.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

Why might you share my personal information with third parties?

We may have to share your personal data with the parties set out below for the purposes set out in the table above:

- Carefully selected third parties who provide a service to us to support our core operations, such as: processing our mail, communicating with customers and prospective customers on our behalf (including via social media), running promotions, providing IT systems and administrative services and the development and improvement of internal systems and processes.
- Competent authorities (statutory bodies, regulatory authorities, authorised bodies who have a role laid out by law);
- Other organisations where we are legally obligated to disclose your personal information (such as requests made in the prevention and detection of crime) or where disclosure is necessary to protect the property, rights and safety of us and our staff;
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice;
- Other companies where we are trialling products and services which we consider may improve our offering to customers and/or our business processes; and
- Other third parties where you have given your express **consent** or where we reasonably believe a third party is acting on your behalf.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Many of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data under the UK adequacy regulations. This includes all EEA countries (including EU Member States) and EU/EEA institutions and Gibraltar as ‘adequate’ under UK law to allow data flows from the UK to the EEA to continue under UK law—although the UK will keep this adequacy decision under review. This may also include the United States of America, Canada, Australia, New Zealand, For further details, see *Explanatory memorandum to the Data Protection, Privacy and Electronic Communications (Amendments etc)(EU Exit) Regulations 2019, SI 2019/419, para 7.4.*
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries.*

Please contact us at enquiries@innerarmour.org if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and EEA.

DATA SECURITY

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

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

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our solicitors: Coffin Mew in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

DATA PROTECTION OFFICER

We have appointed two data protection officers (DPO), Steven Watts and Alastair McGregor to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact them here: enquiries@innerarmour.org

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

CHANGES TO THIS NOTICE

We keep this notice under regular review. Any changes we make to this notice will be posted on our Sites with a prominent notice and, where appropriate, we will notify you by email.

If, in the future, we wish to use your personal information in a way not set out in this notice we will notify you and seek your permission to do so.

CONTACT US

If you would like to request further information about this notice or the way in which we handle your personal information, please contact us at: Inner Armour Training Limited Company Registration No. 12121673 Registered Office: Barttelot Court, Barttelot Road, Horsham, West Sussex, United Kingdom, RH12 1DQ
