

Controller

This privacy policy aims to give you information on how The Compassionate Leadership Academy (CLA) collects and processes your personal data, including any data you may provide through the use of this website.

CLA is the 'controller' of your personal information and is responsible for it. CLA Have an appointed data protection officer (DPO) who is responsible for overseeing questions in relation to this policy. If you have any questions regarding this policy including any requests to exercise your legal rights, please contact the DPO at info@thecl.academy

For more information on Data Protection or if you wish to make a complaint regarding how your personal information has been used please contact the Information Commissioner Office.

Contact details

The Compassionate Leadership Academy (CLA) is registered in the United Kingdom. The company registration number is 9778970. Our registered address is, 2 Castle Business Village, Station Road, Hampton, TW12 2BX.

Content

This policy includes:

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- Categories of personal information
- Social Media marketing
- Use of your personal information
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- Sharing personal data
- Keeping your information up-to-date
- How long we keep your information for
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COLLECTING PERSONAL INFORMATION

We collect personal information in the following ways:

When you provide it directly

For example, when you:

- enquire about our activities or services
- visit our website
- subscribe to CLA programme (personal & corporate)
- sign up to receive updates from us
- post content to our website or via our social media
- meet with us
- communicate with us (either online, by email, phone, SMS or post)

When we collect information when you are using our website – Use of Cookies

Cookies are small files that websites save to your computer or mobile device. They are used to make the site work better for you and to help CLA analyse your use of the website, personalise your experience, and improve the quality of the website.

These cookies are not used to identify you personally but they can remember activities and preferences chosen by you and your browser. You can manage cookies by controlling which cookies are saved or by deleting them.

Via social media and third party links.

Depending on your settings and the relevant policies and terms of service, when using social media and messaging services like Linked In and Twitter, you might give us permission to access information about you from those accounts or services. We do not control third – party links websites and are not responsible for their privacy statements. We encourage you to observe the privacy notice of any website or application that you use.

CLA has links to the following third party software providers:

Skillset – who provide technical support and hosting within Amazon Web Services (AWS)

PayPal Inc. – who provide financial services

Google Analytics – we use to analyse use of the website

CLA also has links to social networking sites (Linked IN, Twitter, Facebook), these websites may place cookies on your computer.

CATEGORIES OF PERSONAL INFORMATION

We may collect different data from you, depending how you use CLA. When you subscribe and create an account with CLA we collect data directly – this will include:

- **Identity** data, including your name, e mail address, telephone number
- **Contact** data, including your email address, company postal address, and phone number
- **Contractual** data to enable the contract to be fulfilled.
- **Technical** data such as your IP address, when you browse our website.
- **Marketing** data such as your preferences for receiving communications from us.
- **Financial** data in relation to payment of services and contractual obligations.
- **Taxation** data when required by UK HM Revenue and Customs i.e. VAT number
- Any other information you provide us as above (see “How we collect personal information”).
- We do not collect sensitive personal data.

Information provided by you

Account Data Personal	To use CLA you will need to create a user account. Information you provide will be: name. e mail and password.
Account Data Company	For company subscriptions the same data will be required and a unique identifying name will be created.
Profile Data	You can opt to provide profile data.
Shared Content	Some modules enable you to discuss and share information in relation to the module content.
Course Data	The course is interactive. You will need to provide information to complete modules. Data will be collected to ascertain which modules you have completed to allow progression through the course.
Surveys	You may be asked to partake in surveys – all surveys will be related to Compassionate Leadership. Results of surveys will be published anonymously.
Social Media	You may wish to comment on our social media sites.
Personal Subscriptions	Payment is processed by PayPal Inc. CLA will not have access to your credit/debit card details.

Company Subscriptions	Will be administered contractually by CLA.
Administration & Support	If you contact the CLA helpdesk to report a problem or concern, we will collect the relevant information to resolve the issue. This may include: name, email, location, operating system and IP address.

Information collected automatically

When you access the CLA website we collect data by automated means, including:

System Data	Technical data about your computer or device, such as your IP address, device type, operating system (& version), unique device identifiers, browser, browser language, domain and other system platform types
Usage Data	Usage statistics regarding your interaction with the CLA modules and website
Geographic Data	An approximate location (city, country) calculated based on your IP address

SOCIAL MEDIA MARKETING

CLA may use third party advertising tools on Linked IN or Facebook. The advertisements will be based on things we know about you (data collected directly or automatically) and what the advertisement service providers know about you based on their tracking data.

USE OF YOUR PERSONAL INFORMATION

We will use your personal information in a number of ways depending on the purposes for which it has been collected, including for the following purposes:

- To provide you with the services or any information you have requested
- To update you about any changes to our services
- To communicate with you as set out in this policy below (including administrative communications as well as communications about our work).
- To administer payments.
- To display your opinion/testimonial on the website (if you have agreed to do so)
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To maintain our organisational records and ensure we have your most up-to-date details, including marketing preferences

- To help us improve our services or information-offering, and improve your interactions with our website (including via cookies)
- To enable you to participate in interactive features on our website
- To enable you to participate in voluntary surveys or research
- To provide feedback regarding your interaction within course modules
- To analyse your website behaviour
- To tailor advertising that is presented to you on the internet according to your interests, preferences and other characteristics, and to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- To deal with enquiries and/or complaints made by or about you
- To audit and/or administer our accounts
- To help us work with third parties to ensure that we send you targeted communications (see “What categories of personal information do we collect?” above)

COMMUNICATING WITH YOU

Administrative & financial communications

We will communicate with you using the contact details you have provided for essential administrative purposes.

Personal subscriptions - financial transactions are governed by PayPal Inc. We do not process or store personal credit/debit card information.

Company subscriptions – will be contracted using data you have supplied. An invoice will be sent to the relevant company personnel.

Marketing communications

(a) Newsletters – relevant to Manley Hopkinson’s work in the field of compassionate leadership.

(b) Events – public events where Manley Hopkinson will be speaking on the topic of Compassionate Leadership or events that may be of interest.

(c) Products – offers relating to Manley Hopkinson’s book “Compassionate Leadership” and the online Compassionate Leadership Academy.

You are in control of how we use your personal information for marketing purposes, and can update your preferences at any time. If you would like to contact us about your marketing preferences, please email info@thecl.academy

If you ask us to stop sending you marketing materials, we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

CHILDREN'S DATA

We do not actively collect information from children (under-18s).

DATA SAFETY & ACCESS

We place great importance on the security of your personal information and always take appropriate precautions to protect it.

We ensure that there are security measures in place to protect your personal data. For example, we use encryption technology on our websites and carry out regular security reviews on our network. All data is encrypted at rest and in flight.

Payment details (such as credit or debit cards) we receive are processed securely by our payment processing providers (PayPal Inc.) who meet the required Payment Card Industry (PCI) Security Standards. We do not have access to your card details.

Payment by BACs is protected by the relevant banking or financial authority.

Purchases of the book *Compassionate Leadership* by Manley Hopkinson, from the Compassionate Leadership website is processed directly by Amazon.co.uk, we do not have access to your card details.

Personal subscriptions - only employees of CLA have access to your information.

Corporate subscriptions – only employees of CLA and the delegated personnel within the company will have access to your information.

SHARING DATA - PERSONAL

We will not share your personal information with others unless we have a duty to do so, to comply with a legal obligation, or in order to protect the rights, property or safety of CLA our employees, suppliers, customers or others. This includes for example:

Service providers who provide technical and system administration services.

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue and Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions

KEEPING INFORMATION UP TO DATE

Where possible, we will endeavour to keep our information up to date. However, we really appreciate it if you let us know if your contact details change. Please contact us

info@thecl.academy

LENGTH OF STORAGE OF PERSONAL DATA

For some information we hold, there are legal requirements which determine how long we must keep it. For example, HMRC require us to retain details of financial transactions between CLA, and its customers and suppliers for 6 years.

Personal data for access to CLA Digital online course is kept for a period of two years from the start date of the course, at which point it will be deleted. Notice will be given to the user to ensure the course has been completed.

Personal data can be revoked on request by should there be changes in corporate subscriptions. Please contact infor@thecl.academy or raise a support ticket in the website.

Please also see section "Your Rights".

LEGAL BASIS FOR PROCESSING OF INFORMATION

Data privacy law requires us to have one or more lawful grounds to process your personal information. The following grounds are relevant to our use of your information:

- Consent. In many cases we will seek consent to process your personal information, for example to send you relevant information in relation to CLA activities. Where we do rely on consent, you are entitled to withdraw it at any time.
- Where we have a contractual relationship with you. If we enter into a contract with you we will process information to administer that contract.
- Legal obligations. We will sometimes pass on personal information to comply with legal obligations such as providing tax information to HMRC.

- “Legitimate Interests”. Where it is appropriate we rely on the processing being in our legitimate interests, provided we are confident that such processing is not likely to override your own legitimate interests or rights and freedoms.
- Administration,
- Financial management and control

YOUR RIGHTS

You retain ultimate control of how we use your personal information.

You can always request details and copies of the information we hold about you.

Data protection law gives you a number of additional rights. These include:

- The right to rectification: To have personal information amended if it is inaccurate or incomplete. You can ask us to check the personal data that we hold about you if you are unsure.
- The right to erasure: In some cases, to have your personal information erased (or anonymised), including when consent is withdrawn, your information is being unlawfully processed or it is no longer necessary for us to process it.
- The right to data portability. Where we are processing your information on the basis of consent you can request it to be transferred from one service provider to another in a suitable format.
- The right to object. You can ask us to stop processing your personal information in certain circumstances, including an absolute right to ask us to stop processing for direct marketing.
- The right to restrict processing. If there is any disagreement about the accuracy or legitimate usage of your personal information, you can ask us to “hold” it but not use it further, whilst the issue is resolved.
- You also have rights in relation to “automated decision making”. Manley Talks Ltd does not currently undertake this activity, which involves complex computerised processes which produce legal effects.

If you want to enforce any of these rights in respect to your personal information, please contact:

info@thecl.academy

COMPLAINTS

If you would like to make a complaint about how we process your personal data, please contact

info@thecl.academy

You are entitled to [make a complaint to the Information Commissioner's Office](#) at any time. However, we are grateful for the opportunity to address your concerns before you feel this step is necessary.

The ICO's address:

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

CHANGES TO THIS PRIVACY POLICY

This policy may change from time to time. If we make any significant changes to this policy, we will publicise these changes clearly on our website or contact you directly.

This Privacy Policy was last updated: August 2023

END

