



## Privacy and cookie policy

Last reviewed date: 8<sup>th</sup> August 2019

### Introduction

Winning Within is committed to safeguarding the privacy of our website visitors and clients. This policy sets out how Winning Within uses and protects any information that you provide when you use [www.winningwithin.co.uk](http://www.winningwithin.co.uk) or our services.

Here you can read further information about how we use your data or explore in more detail how and why we use cookies to enhance your browsing experience. By using [www.winningwithin.co.uk](http://www.winningwithin.co.uk) or our services you are agreeing to the terms set out, and consenting to the use of data described in this policy.

### Personal information

In providing you with our services, we may handle your personal information. Personal information is information about you from which you can be identified, such as your name and contact details.

By providing your data and/or information, or by using the Winning Within website, you consent to the use of your data and information as described or referred to in this privacy notice and the cookie policy. If we make a change to any of the ways in which we process personal information, we will update this policy with an updated date displayed at the top of this page.

### Confidentiality

The confidentiality of your personal information is of paramount concern to Winning Within and we comply with UK data protection law.

### Information we may hold about you

The information we hold about you may include the following:

- basic details such as name, job role, company address and contact details;
- details of services you have received;
- records of any meetings or correspondence we have shared;
- information you have given us freely about the delegates on our training courses or our one-to-one coaching programmes;
- information about your company or staff you have freely given us to enable us to provide a proposal or our services;
- information from customer surveys, competitions or marketing activities;
- email communications we receive or make;
- other information we receive from other sources such as analytics providers, or information provided by other companies who have obtained your permission to share information about you.

## When we collect your information

Information about you is collected when:

- you enquire about our services;
- you submit a query to us, for example by email, telephone, social media or the Winning Within website;
- you participate in any marketing activity;
- you leave us your contact details at a promotional event;
- you subscribe to email notifications and/or newsletters;
- we meet with you to discuss potential services;
- we confirm you are booking our services;
- we meet to discuss ongoing services;
- you participate in a training event or coaching session;
- we share any correspondence via email, social media, telephone or face-to-face.

We may also collect personal information about you from other people when:

- you are named on a delegate list for an event at which you and Winning Within attended.

## Storing your data

Your information is stored on a secure, password-protected computer and is only accessible by the relevant Winning Within employees. If you have shared your email address with us, your name and email address may be stored on a marketing email platform called Mailchimp. Mailchimp's servers are based in the USA so your name and email address may be held outside of the EEA.

Any personal information collected during coaching or training interventions will be kept safe in a locked place. We only keep these session notes to aid the client during the length of the training to ensure success, accountability, commitments, and taking action.

## Sharing information

We do not share your personal information with anyone outside of Winning Within to use for their own purposes, except:

- when we have your permission;
- when we are permitted or obliged to do so by law;
- to protect the rights, property, or safety of Winning Within, our clients, employees or others;
- in order to detect, prevent and help with the prosecution of crime;
- if there are other exceptional circumstances, and we are unable or it is not appropriate to seek your permission.

## Third party websites

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## Using your information

We use your personal information to provide you with our services, and to improve and extend our services. This may include:

- responding to your queries;
- providing you with a proposal;
- internal record keeping and administration;

- responding to requests where we have a legal or regulatory obligation to do so;
- assessing the type and quality of service you have received and any concerns or complaints you raise, so that these can be properly investigated;
- using your contact information to send you service-related information;
- sending promotional material about new services, special offers or other information we think you may find interesting (see 'Keeping you informed' below for more information);
- sending you a customer satisfaction survey or feedback requests for delegates;
- conducting and analysing market research;
- sending invoices and payment reminders to you, and collecting payments from you;
- sending you any emails or downloads you have requested;
- sending you our email newsletter if you have requested it.

### **Keeping information**

We will only keep your personal information for as long as is necessary and in accordance with UK law. We will destroy any personal delegate information obtained during coaching or training interventions at the end of any such course of training or coaching.

### **Keeping you informed**

We would like to keep you informed of our services that we consider may be of interest to you via email. When we collect your information, we will ask you if you would like us to keep you updated in this way and will give you the option to opt-out.

If you do not wish to receive marketing information about our services, or at any time you change your mind about receiving these messages, please contact Winning Within via the contact methods shown below.

### **Your rights and how to exercise them**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- request for us to change incorrect or incomplete data;
- request for us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing.

### **Accessing information**

If you have any data protection queries, or wish to exercise any of your rights, please contact Winning Within:

Email: [enquiry@winningwithin.co.uk](mailto:enquiry@winningwithin.co.uk)

Write: Winning Within, c/o Opus Accounting Limited, Pound Court, Pound Street, Newbury, Berkshire RG14 6AA

You should also contact Winning Within if you wish to request a copy of the personal information we hold about you and to ask us to correct or remove (where justified) any inaccurate information. We may ask you to provide additional documentation to confirm your identity or, if you are seeking to access personal information of another individual, proof of their consent or your legal right to receive their personal information. If you are seeking personal information on behalf of another individual we may charge for this.

## **Updating this privacy notice**

We review and update this notice regularly. The latest copy of this notice can be found on this web page.

## **Cookies**

### **What is a cookie?**

A cookie, also known as a browser cookie, is a text file containing small amounts of information which a server may download to your computer hard drive, tablet or mobile device when you visit a website or use an app.

Cookies do not typically contain any information that personally identifies a user, but personal information that I store about you may be linked to the information stored in and obtained from cookies.

Cookies may be either 'persistent' cookies or 'session' cookies. A persistent cookie will be stored on the web browser and will remain valid until its set expiry date, unless detected by the user before the expiry date. A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

### **First party and third party cookies**

Cookies can be set and controlled by the operator of the website which the user is browsing (known as a 'first party cookie') or a third party such as Facebook, for example to display advertisements and social sharing features, (known as a 'third party cookie').

### **Cookies used by Winning Within**

Winning Within uses cookies for Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so that they can improve it.

Like many services, Google Analytics uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve the website.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

Google Analytics collects information anonymously. It reports website trends without identifying individual visitors.

### **How can you control the use of cookies?**

You can opt out of Google Analytics without affecting how you visit the Winning Within website – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this [Google page](#).

### **Sharing of data from cookies**

We may disclose data collected from third party cookies, such as visitor trends, to third parties, in an anonymous form, for research and statistical purposes, and to help us optimise our website.

### **Learn more about cookies**

To find out more about cookies in general either search in Google or visit [aboutcookies.org](http://aboutcookies.org)

or [allaboutcookies.org](http://allaboutcookies.org) (which is run by the IBA Europe).

A guide to behavioural advertising and online privacy has been produced by the internet advertising industry which can be found at [www.youronlinechoices.eu](http://www.youronlinechoices.eu). The guide contains an explanation of the Internet Advertising Bureau's self-regulatory scheme to allow you greater control of the advertising you see.