

Inspiring Insights LTD respects your privacy and is committed to protecting your personal data. This privacy notice informs you as to how we look after your personal data which you provide to us, or which we obtain, when providing services to you, when you use our website ([www.inspiringinsights.co.uk](http://www.inspiringinsights.co.uk)), or when we deal with you in the course of our business.

We may update this privacy policy from time to time – you can find our latest policy on our website at <http://inspiringinsights.co.uk/privacy> or by asking us for a copy.

## 1. Important Information

Inspiring Insights LTD (company number 09210048) is the controller and responsible for your personal data (collectively referred to as “Inspiring Insights”, “we”, “us” or “our” in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### Contact details

Our full contact details are as follows:

Address: Inspiring Insights LTD, Cornwall House  
4a Churchfield Road, Ealing, W13 9NG

Data Privacy Manager: Jenny Moore

Email address: [jenny@inspiringinsights.co.uk](mailto:jenny@inspiringinsights.co.uk)

### Third-party links

Our website 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.

## 2. The data we collect and how we store it

### The data we may collect

We may collect, use, store and transfer some or all of the following:

- **Identity and Contact Data:** personal and identity data, including your names, date of birth, copies of ID, and contact details;
- **Financial Data:** including details of your bank accounts, payment card details;
- **Transaction Data:** details of services we provide to you;
- **Psychometric and 360o Feedback data:** Information you or others provide as part of an assessment or feedback process.
- **Technical Data:** information we collect automatically when you visit our website, interact with us by email or complete an on-line assessment or 360o feedback survey. This may include your IP address, browser details, and device details;
- **Marketing and Communications Data:** includes your preferences for receiving marketing from us and your communication preferences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

## How we may store your data

Inspiring Insights Ltd use a range of 'subprocessor' third party services to help us deliver services to you. These subprocessors listed below may have access to the identifiable data we collect about people in our assessment or 360° Feedback projects.

Legal entity	Entity country	Subprocessing activities
Microsoft Office 356	USA	Email & sharing information with participants
Dropbox International Unlimited Company	Ireland	Internal sharing of files for customer support
Skype Communications S.a.r.l	Luxembourg	Video conferencing services
Mailchimp	USA	Email surveys

Please contact our Data Privacy Manager if you would like to confirm our subprocessor partners.

## 3. How we use your personal data

We will only use your personal data when the law allows us to. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. We may process your personal data without your knowledge or consent, but only where this is required or permitted by law.

You may receive marketing communications from us in respect of our business and our services if you have requested information from us or purchased services from us. You may opt out of receiving marketing communications at any point.

For a full description of all the ways we may use your personal data, and which of the legal bases we rely on to do so please contact our Data Privacy Manager.

## 360° Feedback and psychometric data

When conducting psychometric assessments or 360° Feedback we use the feedback and responses collected to:

- **Create individual reports** to interpret self-assessment data or aggregate the feedback collected about an individual being assessed. When conducting 360° Feedback, with the exception of the self-assessment and line manager's feedback, feedback will be anonymized by combining it with the feedback given by others. Text responses will be unaltered and so may be identifiable from the language used or feedback given.
- **Review group or company-wide results** to review trends and perform a Training Needs Analysis (TNA). All psychometric, assessment and feedback data will be anonymized by combining responses. Text responses may be updated to remove names used and may be updated to emphasize key points. However, text responses may still be identifiable from the language used or feedback given.
- **Screen for and remove any undesirable or abusive feedback** that may be provided as part of a 360° Feedback programme.

## Marketing

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

Before we share your personal data with any third party for their own marketing purposes we will get your express consent. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at [jenny@inspiringinsights.co.uk](mailto:jenny@inspiringinsights.co.uk) at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

## Who we share your data with

We may share:

- **The individual self-assessment or feedback report with the person being assessed.**
- **The individual self-assessment or feedback report with the line manager or coach of the person assessed.**
- **Aggregated and anonymized group or company-wide reports with the HR team, senior management, and others** to help us review trends and identify opportunities to improve how we support organisational and personal development at a group level.
- **Individual responses with project administrators** for the purposes of providing support, reviewing group and company-wide results, and screening for abusive feedback. Staff from the Human Resources function may be given project administrator access. You may request an up-to-date list of who has access to 360° Feedback or assessment projects you are involved in by emailing [jenny@inspiringinsights.co.uk](mailto:jenny@inspiringinsights.co.uk)
- **Your data with our service providers.** We use the following third-party service providers to support 360° Feedback and self- assessment processes. We have reviewed that each meet our standards and legal requirements for data protection and will monitor to make sure they continue to do so.

Third party service providers
OPP, Insights Discovery, Spidergap

## 4. Disclosure of personal information

Whilst undertaking duties on your behalf we may have to share your personal data with the parties set out below:

- Third parties who we interact with on your behalf including providers of diagnostic assessments, and your employees and staff.
- Our consultants some of whom are self-employed.
- Service providers based within the UK, wider EEA or outside the EEA who provide IT and system administration services.
- Event Partners who assist us with organising events and marketing those events, based in the UK, wider EEA or outside the EEA.
- Our professional advisers including lawyers, bankers, auditors and insurers based in the UK or EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs regulators and other authorities based in the UK who require reporting of our processing activities in certain circumstances.

## 8. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are set out below. If you wish to exercise any of the rights set out above, please contact our Data Privacy Manager.

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

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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.

### Complaint to the ICO

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

### Your legal rights

Your legal rights are as follows:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 9. Third-party Links

This website 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.

## 10. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please refer to <https://www.inspiringinsights.co.uk/cookie-policy.html>