

# Be...

## Rules/Regulations GDPR (General Data Protection Regulation) Customer Privacy Notice



This document describes how Be... as a Data Controller collects, uses retains and shares your business and personal data.

## The Information Used by Be...

- ➔ To enable Be... to provide you with products and services certain information is required. This includes:
- Contact details, titles, full names, e-mail addresses and telephone numbers.
  - Records of how you have got in touch or how we have met or made contact.
  - When working with individuals and organisations:
    - Information necessary to identify organisational or personal development or training needs. For this purpose, questions will be asked, and information recorded relevant to assessing and thereafter to providing a suitable service.
  - As applicable, data to tailor communication with you.

## The Lawful Basis for Processing Data (The Purposes for which your information is used by Be...)

- ➔ **Lawful Basis 1. In the performance of a contract with you**
- To deal with requests for products or services.
  - To provide you with information about products and services or an initial proposal or a quote.
  - For the purpose of providing you with options with respect to products and services.
  - To enter into a contract with you or to perform a contract with you. In these cases, information will be processed at all stages relevant to managing the transaction including providing proposals, updating of records, undertaking

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the agreed course of activity and carrying out post actions.

- When you ask for information to be shared with Sub-Contractors or Associates who are being introduced in order to provide you with a product or service which may not directly be supplied by Be...
- Third parties. For example, PayPal during certain financial transactions, Mail Chimp who deliver a mailing service for Be... and other data systems (who, where applicable if based within the UK or European Economic Area (EEA) are required to protect as per GDPR standards).

## ➔ Lawful Basis 2. Legitimate interests

- For the audit and management of Be... which may include accounting.
- To maintain information which may be necessary under bodies such as HMRC.
- To monitor and keep records for analysis, quality assurance and the development of statistics.
- The protection of business risks and ethical purposes.
- For the legitimate interests of marketing as per ICO (Information Commissioner's Office) guidance. Within this framework the following is applied:
  - **Purpose:** The legitimate interest underpinning promotion and direct marketing by Be... is to provide useful and helpful updates and information for the purpose of supporting the psychological wellbeing and development of individuals and organisations.
  - **Necessity:** Processing is necessary under the legitimate interest and purpose as described above.
  - **Balance Test:** Concerning business to business marketing the Information Commissioner says, 'Business contacts are more likely to reasonably expect the processing of their personal data in a business context, and the processing is less likely to have a significant impact on them personally' Therefore, the legitimate interest is not overridden by the interests of the individual who can reasonably expect to be contacted with marketing material in the context of their professional role.

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## ➤ Lawful Basis 3. Processing with your consent

- To keep you up-to-date and informed of products and services (Please note: For processing that is based on your consent, you have the right to withdraw consent. This can be done by contacting Be... by e-mail or by selecting the unsubscribe option used with some promotional updates).
- When you request and consent to the sharing of information with third parties.

## ➤ Lawful Basis 4. Processing for a substantial public interest

- Any processing that may be required to fulfil legal obligations.

## How is Information is Collected and Stored by Be...

### ➤ Information is collected from different sources:

- Directly from individuals and organisations.
- Third parties such as Business Partners.
- Third parties who may provide a service on behalf of Be... such as Associates.
- Publicly available sources.

### ➤ Information is stored and kept as follows:

- As appropriate, data is retained for as long as necessary to fulfil legal and regulatory obligations such as time spans indicated by HMRC.
- If you believe retention of your data is no longer necessary, you can request for it to be deleted. Action will be taken within a reasonable period to delete

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your data unless the request is overridden by the requirement to meet regulatory obligations.

- Be... believes that reasonable steps are taken to protect data from misuse, unauthorised access, loss etc. However, with regards information technology, high profile cases remind us that IT is not infallible. Therefore, this should be kept in mind with respect to the disclosure of personal details via these mechanisms.
- Your personal data is never sold to other parties and only shared as per the descriptions shown in this document.

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