



GLA – PRIVACY POLICY

Last updated on 22nd August 2023

IT IS IMPORTANT THAT YOU READ THIS PRIVACY POLICY AND ENSURE THAT YOU AGREE TO ITS TERMS: GLA undertake various assessment services on behalf of employers and third-party coaches. Undertaking these assessment services can result in us obtaining some sensitive information about you. As such it is important that you have read and agreed to this policy before you proceed with the assessment and understand what data we collect AND when and in what circumstances we may pass that data on.

PLEASE NOTE

We are carrying out the Assessment Services on behalf of your Employer or a Third Party Coach (each as defined below). To the fullest extent allowed by law, we are not liable for any results, nor do we accept any responsibility for how Reports are used or relied upon by you, your Employer or Third Party Coach.

ABOUT US

Global Leadership Associates Limited (**GLA**) is a private company registered in England & Wales under company registration number 10143897. Our registered office is at 264 Banbury Road, Oxford, England, OX2 7DY.

CONTACT US

If you have any queries, please contact via <https://gla.global/contact-us/>

DEFINITIONS

In this policy we will make references to a number of terms that we feel are beneficial to define now. These include:

AI: as part of our Assessment Services we may use Open AI to assist us in the work that we undertake for you. Details of how we use such AI are set out below.

Assessment Data: the data collected pursuant to the Assessment Services including the Sentence Stem Information together with any data collected via (if we agree to make it available to you) the online journal



solution and online transformation cards together with such other data collection resources as we may offer from time to time;

Assessment Services: means the GLP or My World View assessment services including psychometric testing, reporting or coaching. This may be part of a service that you have taken directly with us or which we have agreed to provide to you as part of a contract we have with your Employer or Third Party Coach.

Employer: it is possible that the Assessment Services are offered via your employer or company that you work for.

Experts: in order to carry out our Assessment Services we may use third party experts. These experts are contracted with us to provide the Assessment Services.

Reports: any report or information sheet that we create as part of the Assessment Services as a consequence of information provided by you, including Sentence Stem Information.

Sentence Stem Information: as part of our Assessment Services, you will be required to complete a number of questions. These questions may result in you providing sensitive information about you.

Third Party Coach(es): a third party coach who is working with you and has asked us to carry out an Assessment Service.

INTRODUCTION

GLA respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you engage in our Assessment Services. It also tells you about your privacy rights and how the law protects you.

PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how GLA collects, uses, processes and shares (together **collect** or **use**) your personal data when you engage in our Assessment Services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions so that you are fully aware of how and why we are using your data.

CONTROLLER

This privacy policy is issued on behalf of GLA.

We are registered with the Information Commissioner (**ICO**) in England and Wales. Our registration number is: ZA752744.

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

CONTACT DETAILS



If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager via any of the following ways:

Full name of legal entity:	Global Leadership Associates Ltd
Contact Page:	https://gla.global/contact-us/
Postal address:	264 Banbury Road, Oxford, England, OX 2 7DY

You have the right to make a complaint at any time to the ICO, the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. This version was last updated on the date set out at the front of the policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, age, username or similar identifier, title, and gender.
- **Contact Data** includes your address, work and personal location, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access the Assessment Services.
- **Profile Data** includes your username and password.
- **Usage Data** includes information about how you use our products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Employment Data** includes your position.
- **Special category data** this includes information relating to your ethnicity, age, sex, spoken language(s). In addition, we will also collate a range of information directly from your completion of the Assessment Services that may/may not include the above but also other personal and potentially sensitive



information (this is what we refer to as Assessment Data). The level and type of information is collated in free-form and as such is determined by you.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may use Aggregated Data for the purpose of providing training, knowledge management and horizon reports, and to help us improve the products and services we offer. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or 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.

HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity Data, Contact Data, Employment Data and Special category data by filling in forms or by corresponding with us (or one of our Experts) by post, phone, email, face to face chats or online meetings (either visual or audio) or otherwise.

Your input: as part of the Assessment Services, we may also collect data (including Assessment Data) by you completing questionnaires or submitting information by some of the resources and functionality we make available from time to time (for example, via the note journal or the transformation cards);

Automated technologies or interactions. As you interact with the Assessment Services, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third party analytics providers such as Google based outside the UK. We may also receive information about you from your Employer or Third Party Coach.

Employer and/or Third Party Coach. It is possible that your Employer or Third Party Coach may provide us (including our Experts) with information as part of any approved Assessment Service.

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 (or via your Employer or Third Party Coach). **Performance of Contract** means processing your data where



it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- Where we need to comply with a legal obligation. **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

We will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a user of the Assessment Service	(a) Identity (b) Contact (c) Assessment Data	Performance of a contract with you, your Employer or Third Party Coach.
To carry out the Assessment Service	(a) Identity (b) Contact (c) Employment (d) Assessment Data	(a) Performance of a contract with you, your Employer or Third Party Coach. (b) Necessary to comply with a legal obligation.

		(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you, your Employer or Third Party Coach. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

In carrying out the Assessment Services we wish to highlight the following things to you:

- We may use AI as part of the Assessment Service. Any use of AI is to assist us in carrying out initial assessments of your responses to us (including our Experts). AI is NOT replacing our use of human expertise



but is designed to facilitate and help as part of the process. AI results and interaction are randomly selected to be checked and reviewed by appropriate experts (including Experts) for quality control purposes;

- We use third party Experts to assist us in carrying out Assessment Services, personal data will be available to them as part of them undertaking the service;
- Employers and Third Party Coach: if you are participating in an Assessment Service via an Employer or a Third Party Coach, we may pass on general information including confirmation of your participation to your Employer or Third Party Coach. **In addition, the results (including Assessment Data) of any Assessment Service ordered by a Third Party Coach are forwarded directly to such Third Party Coach to assist them in completing the service they offer you. Any Assessment Service ordered by Employers will only be forwarded to those Employers if you have given us your permission.**

MARKETING

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

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. 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 you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

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.

CHANGE OF PURPOSE

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. If you wish to get an



explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table *Purposes for which we will use your personal data* above.

External third parties such as:

- Professional advisers : including lawyers, auditors and insurers who provide consultancy, legal, insurance and accounting services.
- Employers, Experts and Third Party Coaches.
- Regulators and other authorities : based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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 policy.

Data collected for the purpose of carrying out Assessment Services will only be strictly for the purpose on which it is collected. Please see sections above for more information.



INTERNATIONAL TRANSFERS

It is possible that we will need to send your personal data to locations outside the EEA or UK. This will only be in connection with the provision of the Assessment Services.

In carrying out the Assessment Services, we may transfer your personal data outside the EEA/UK because:

- You are based outside the EEA/UK. In which case you consent to such transfer;
- Your Employer or Third Party Coach is based outside the EEA/UK and you have consented to us passing on personal data;
- We determine to use a specific Expert as part of the Assessment Services and such Expert is based outside the EEA/UK.

In the event that we transfer your data outside the EEA/UK then we will comply with all applicable international data transfer laws.

DATA SECURITY

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

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

DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.



By law we have to keep basic information about our customers (including Contact, Identity) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

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, though we may need to verify the accuracy of the new data you provide to us.

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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

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:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- 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.

If you wish to exercise any of the rights set out above, please contact us using the details set out in the Contacting Us section above.

No fee usually required

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. Alternatively, we could refuse to comply with your request in these 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 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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.