

## Privacy Policy

*In light of the introduction of GDPR (25 May 2018) we have updated our Privacy Policy to strengthen your privacy rights and provide clarity on how we store and use your data.*

- *We've made it clearer what data we collect from you and what we do with it.*
- *We've made it clearer who we share your data with and why.*
- *We've given you additional information about how long we store your data for.*
- *We've provided detail on how you can exercise the various rights associated with your data.*

### Capstone International

Capstone International. ("we" or "us") are committed to respecting your privacy and protecting your personal information.

As a leadership and development training consultancy Capstone International provides a breadth of products and services to our Clients which include and are not exclusive to: facilitating Board level discussions, designing & leading Team workshops, coaching Executives, providing individual and team tools & surveys.

This privacy policy applies to anyone who asks us about, buys or uses our services and products, as well as those who partner with us in delivering the services.  
For employed staff, please refer to a separate policy.

This policy covers the areas of Personal Identifiable Information (PII), revising PII, the processing and sharing of your information, your rights in regard to your PII, the security and storing of information, plus transfer outside of EAA.

#### 1. Personal Identifiable Information. (PII)

- We collect personal information from you and from authorised third parties (Client example: HR Manager booking a cohort of participants onto a workshop / Associate Example: completion of security checks as outsourced to an agency). Please note that we cannot accept responsibility or liability for any use of your personal information by third parties. We encourage you to review the privacy policies of any third party before you submit any personal data to them.
- Other users of our products or services may provide us with information about you if they designate you as the necessary contact for delivery of part of the contract. For example: a billing, regional, or technical contact on the Client organisation's account.
- Capstone International aims to only collect necessary data for the service we are offering to Clients. We seek to always be transparent about why we request PII and what we need it for and you are always welcome to ask for further information.
- We collect:
  - **Associates – PII:** PII will include data such as your name & contact details, your photo and biographical details (to create a Bio for Clients), for some of you we collect additional information, such as: passport information (so we can book flights & travel arrangements).

- **Client - Account information:** we collect information from you such as your name and email address, your title in the business, phone number, address and organisation. We shall also ask for and collect personal information such as an email address and name from any individual that you authorise in relation to your account with us.
- **Client & Associate - financial information:** to enable payments to be made and money transferred electronically, we collect your invoicing details, including address, VAT/ TIN number and required banking / financial information.
- **Cookies:** our website use cookies to distinguish you from other users of our products, services and website. This helps us to improve our website's performance and your experience of using our website. You can control the use of cookies at the individual browser level. Some of those cookies are necessary for the use of our services. If you reject cookies, you can still use our website, but your ability to use some features or areas of our website may be limited. Currently these are limited to:
  - `_gat` this cookie does not store any user information, it's just used to limit the number of requests that have to be made
  - `_gid` Used to distinguish users.
  - `_ga` Used to distinguish users.
- If it were ever to occur that we wished to collect PII for any reasons other than already stated. We will make it clear what we are asking for and give you opportunity to confirm, restrict or reject our request.

## **2. Revisions to your PII**

- If you wish to update, amend or request deletion of your personal information you may do so by emailing us at [DataAdmin@capstoneinternational.com](mailto:DataAdmin@capstoneinternational.com). We will respond to your request within the required time period.
- If Capstone International Limited were ever unable to meet a request due to legitimate exceptions, we will explain why in writing.
- If you ever wish to withdraw permission to process your information, we will make clear any impact that it will have on our ability to provide services and fulfil a contract. For example: a 360 online tool is not possible without your email address.

If it were ever to occur that we wished to use your PII for any reasons other than already stated or have legal reasons for, we will ask your permission. We will make it clear what we are asking for and give you opportunity to confirm, restrict or reject our request.

If you ever wish to make changes to your personal information or the way in which we process it, please advise us by email [DataAdmin@Capstoneinternational.com](mailto:DataAdmin@Capstoneinternational.com)

## **3. Processing your information.**

- We apply high standards of security to all information that we hold

- We process personal information to manage all aspects of our relationship with you as is in your and our interest; and as is necessary to provide the services that have been agreed.
- We may use your information to send you personal greetings or marketing communications. If you would prefer not to receive such communications, please contact us at [DataAdmin@capstoneinternational.com](mailto:DataAdmin@capstoneinternational.com).
- We will use your contact information and any information that you send to us to respond to your questions, requests for information or complaints.
- When required to do so by a supervisory authority or government, we may use your information to comply with a legal obligation.
- We do not provide your information to third parties for marketing purposes
- If the service you are buying or using has any specific privacy and/ or processing details, we will advise you at the start. For example: the note taking and keeping of records by an Executive Coach.

If it were ever to occur that we wished to use your PII for any reasons other than already stated or have legal reasons for, we will ask your permission. We will make it clear what we wish to do and give you opportunity to confirm, restrict or reject our request.

Under GDPR we are required to have legal basis for processing data of any individual natural person to EEA. In addition, we have chosen to apply the same standard of service and processing for all our clients around the globe. We record these as:

1. where we require the information to perform a contract with you, to deliver the services that you have requested
2. where we have your consent to do so, and in this case you have the right to withdraw or refuse to give your consent at any time
3. where the processing is necessary for our legitimate interests (and those legitimate interests are not overridden by your interests or fundamental rights and freedoms);
4. where we need to comply with a legal or regulatory obligation.

If you have any questions about the legal basis on which we collect and use your information, do contact us through [DataAdmin@CapstoneInternational.com](mailto:DataAdmin@CapstoneInternational.com)

#### **4. Sharing your PII**

We will disclose your information in the circumstances below:

- We may disclose your information to our third party service providers. In each case we have agreements in place with the service provider to ensure that they provide appropriate protection for your information and to ensure that they are only permitted to use your information in accordance with our instructions and as necessary to provide the relevant service to us.
- We may need to disclose your information to our professional advisers, including our lawyers, bankers, auditors and insurers.

- We may also have to disclose your information if this is reasonably required to comply with legal obligations and enforce our rights:
  - comply with any applicable law, regulation or legal process or to respond to a request from a government or a regulatory body.
  - enforce our agreements, policies and website terms of use.
  - protect the security or integrity of our products and services.
- Where your organisation purchases products or services from us covering multiple authorised users and contacts, we may disclose your information to other users within your organisation, in order to deliver our products and services.

## 5. Your rights as an individual

GDPR gives European individuals control over personal identifiable information both inside and outside of Europe. Your rights are:

1. **Right to be informed** - *to know what data we collect or process*
2. **Right of access** - *to ask for copy of your PII and know why we are processing it*
3. **Right to rectification** - *on request, have inaccurate or incomplete data corrected*
4. **Right to be forgotten** - *to have your data deleted from records*
5. **Right to restrict processing** - *to block any further processing of your data*
6. **Right to data portability** - *to reuse your data on different services*
7. **Right to object** - *object to your data being processed in marketing, research etc.*
8. **Automation & profiling rights** - *protect yourself against automated decisions & profiling*

- To discuss and/ or exercise any of your rights in regards to PII which we have received, processed, stored and deleted, please contact [DataAdmin@CapstoneInternational.com](mailto:DataAdmin@CapstoneInternational.com)
- To protect your privacy and security, we may take steps to verify your identity before complying with the request.
- You may change your mind and consent or withdraw consent at any time where we are relying on consent to process your personal information. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- In some situations, we may be able to demonstrate that we have compelling legitimate grounds by which your request will not be fulfilled. If this were to be the case, we would advise you in writing, explaining why.
- If I have any questions or concerns about data protection, you may write to our DPO. Data Protection Officer: [nick.davies@Capstoneinternational.com](mailto:nick.davies@Capstoneinternational.com).
- You also have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. In the UK, this is the Information Commissioner's Office <https://ico.org.uk/>.

## 6. Security of your information

We take the security of your information extremely seriously. All information that you provide to us is either electronically stored on secure servers or as hard copies in lockable filing cabinets.

Our data centre providers are ISO27001 certified, and where you use our online tools, your Questionnaire Data is encrypted on the servers at rest and in transit across the internet.

## **7. Time frames for storing and deleting your information**

We keep your personal information in line with time periods we have determined using the following criteria:

- the types of products or services you have with us
- how long it is reasonable to keep records to show we have met the obligations we have to you and by law.
- any periods for keeping information which are set by law or recommended by, professional bodies or associations.
- how long you have been a Client or Associate with us, and when you cease stop being in relationship with us as a Client or Associate

We have processes in place for the regular management and deletion of PII. Clients and Associates are informed of this in discussions at the point of contracting. Individuals may request this information and discuss an alternative time schedule of their choosing with us by contacting [DataAdmin@CapstoneInternational.com](mailto:DataAdmin@CapstoneInternational.com)

## **8. Transfer of Information outside the EEA**

Capstone International partners with clients around the globe. As a result, we may transfer your personal information to countries outside the EEA (the EU member states plus Norway, Liechtenstein and Iceland) for the purposes set out in this privacy notice. Where this is applicable, we take steps to make sure that when we transfer your personal information appropriate protection is in place.

### **Note:**

If and when we have reason to revise our privacy policy, we will upload the changes to our website. If the changes significantly impact any of our services or relationships, we will email those who are affected.