



PRIVACY POLICY

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Nkuzi Change provides consulting, training and coaching services to organisations and individuals. Trust and confidentiality are at the heart of what we do. Your privacy and the safety of your personal information matter to us. This policy sets out everything you need to know about our obligations as data controller and your rights regarding our use of your personal information.

DEFINITIONS

“Nkuzi Change”, “we”, “us” and “our”: Tinye Limited trading as Nkuzi Change.

“Services”: the consulting, training and/or coaching services provided by Nkuzi Change.

“Client”: the organisation with which we have a contract to provide the Services.

“Coach”: the individual coach delivering coaching services on our behalf.

“User”, “you”, “your”: individual employed by a Client using our Services.

USE OF INFORMATION

1. Legal basis for processing

Where we process your personal information, we will only do so in the following situations:

- We need to use your personal information to perform our responsibilities under our contract with our Clients (e.g. providing our Services and processing payments for them)
- We have a legitimate interest in processing your personal information (e.g. to provide, secure and improve our Services, to communicate with you about changes to our Services and to send you marketing communications).
- You have provided consent for us to process your personal information.

2. Delivery of our Services

We collect and process personal identifiable information to perform our contractual obligations under the contracts with our Client. This includes:

a) For our one-to-one coaching services:

We obtain your name and email address directly from you, or from our Client, when you are nominated as a Coachee for one of our programmes. We collect this information and add it to the secure software platforms that we use to administer our contracts for coaching services with our Clients.

When you book a coaching session, Nkuzi Change will hold and process your personal data (including name and email address) through the online booking platform. This feeds into the Coach's Nkuzi Change calendars and email so that they have that information too.



When there is an ongoing coaching relationship between Coachee and Coach, such as a six month programme, your coach may keep notes on your sessions for the duration of the programme. These will be treated with utmost confidence and destroyed at the end of the programme.

Our Coaches may also be making notes in general terms and in a way that does not identify you. The aim is to capture any noticeable trends with regards to any cultural themes and challenges relevant to the organisation as a whole. Nkuzi Change will provide thematic observations back to the Client. In doing so, we will always take care to preserve the anonymity of the Coachees.

Coaches may also create notes upon topics discussed and actions agreed with you in your session, and summarise them in an email or report to share with you, by email, at the end of the session.

In addition, as part of our Coaches' continuing professional development, they keep a coaching log with your name, email address, date of the coaching and total number of coaching hours. This is for credentialing purposes and will only be shared with the professional body, if requested by it in its spot checks of Coaches' records. This log is kept securely by the Coach to safeguard against inadvertent disclosure to third parties, and the contents of that log will be deleted/destroyed when that content is no longer needed for credentialing purposes. Coaches may also discuss the content of the coaching with their professional colleagues or professional supervisor. However, they will always do so in a way that strictly maintains your anonymity.

If a Coach perceives that there is a risk of harm to self or others during a session with a User, the process we have in place means that the Coach will have to share that User's personal information with us and, if deemed necessary to safeguard the User's safety, the Client.

b) For our consulting and group training services:

We may obtain your name, job title and email address from our Client. This information is used for the administration and delivery by us of our Services. We may use this information to contact you directly to share details of the training you attend.

For group training that is delivered online on a video conference platform (such as Zoom, for example), we reserve the right to record sessions for distribution to Users within your organisation not present at the time of the session. If you attend an online session, you agree to having both your name, as it appears on the screen, as well as any content you might choose to share during the session recorded and shared in this way. If you refuse, we will do everything we can to accommodate your preference, but it may be that you will not be able to attend the session if it prevents us from recording as needed.

We store the personal information described above securely on our employees' computers and Google cloud-based storage service in password-protected files and only share it with our individual contact at the Client, if necessary for the administration of the Services to be delivered.

3. Marketing

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters and us sending them to you. We only do this with your explicit consent and you can withdraw your consent at any time by emailing Kate Franklin at kate.franklin@nkuzichange.com.

4. Legal claims, insurance, risk management and professional advice

We may process any of your personal information identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.



We may also process any of your personal information identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.

We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, coaching credentials with regulatory bodies, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

YOUR DATA PROTECTION RIGHTS

Under data protection law, you have the right to access the personal information we hold about you and to ask for it to be corrected, erased or transferred. You can do so at any time by contacting Kate Franklin at kate.franklin@nkuzichange.com.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy. We will notify you of material changes by email. We encourage you to review the policy occasionally to stay informed about our information practices and make sure you are happy with them.

FURTHER RESOURCES

If you have any concerns with how we have used your data that we have not been able to address for you, the Information Commissioner's Office is there as a further resort.

Helpline number: 0303 123 1113

Website: ico.org.uk