

# Primary Influence UK Ltd – Privacy Notice

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## Privacy Notice

This Privacy Notice explains in detail the types of personal data we may collect about you (as a coach) or your school, community club (as a client) when you interact with us. It also explains how we will store and handle that data and keep it safe.

This notice complies with both the UK DPA (2018) and UK GDPR laws. It is likely that this Privacy Notice will need to be updated from time to time. Each time we make a change we will update the policy by version control as part of our quality assurance processes.

## Company Structure

Primary Influence UK Limited by Guarantee and is registered on Companies House with number: England and Wales: 11685436

## School Consent

We use school information that is readily available on the internet and will only contact schools whose phone numbers are not registered with TPS. We also use the UK Education Data for which your school will have provided consent to the data organisation for our company to contact you. We will only ever contact schools regarding services that may be genuinely be of interest to them and may help them achieve targets on their School Improvement Plan.

## Community Clubs and Societies Consent

We use community club and societies information that is readily available on the internet and will only contact clubs/societies whose phone numbers are not registered with TPS. We will only ever contact community clubs/societies regarding services that may be genuinely be of interest to them and may help them to meet plans agreed by their committees and board members.

## Client Consent

By signing an SLA with us, your school/community club/society is automatically providing us with consent to contact you using the details provided during the booking process. We will only contact you regarding your provision and other provisions that may be of interest to you. After your SLA terminates with us, your details will be filed for five years and will be permanently deleted thereafter. We may contact you after your provision has ended with us regarding complimentary training days or trials that may be of interest to you. You have the right for your consent to be withdrawn at any time by replying to any of our correspondence: "Unsubscribe".

## **Coach Consent**

We use individual and company information that is readily available on the internet and will only contact individuals or companies whose phone numbers are not registered with TPS. We will only ever contact coaches/coach educators regarding opportunities that may be genuinely be of interest to them and may help them gain more income and more work. We will only store details of coaches/coach educators who have completed our application form online, providing us with consent to contact them regarding ad-hoc or permanent vacancies. You have the right for your consent to be withdrawn at any time by replying to any of our correspondence: "Unsubscribe".

## **Employed Coaches**

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, to add you to our payroll, we will need your full name, date of birth, home address and bank details. These will be stored confidentially, and you will access your payslips in a secure log-in area to protect your security.

All of your personal information, including copies of your identification and Enhanced DBS details, will be stored in our secure CRM and schools/community clubs/societies will have access to this information by logging-in to their secure and private area of our website (e.g. Dropbox, Anchor).

By signing a contract with us, you are automatically giving us consent to contact you for future opportunities to provide you with work – whether that be on an ad-hoc or permanent basis.

Upon termination of your contract with us, we will ask you to complete a form if you would like us to keep your details on file for any future opportunities. If you do not wish to be contacted for future opportunities, we have to keep your details on file for five years to comply with employment law. However, your data will not be used and will remain dormant.

## **Legal compliance**

If the law requires us to, we may need to collect and process your data. For example, we may need to pass on details of people involved in fraud or criminal activity to law enforcement.

## **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history information of Curriculum Support/PPA Services, Summer Camps/Coaching services you have previously purchased from us to send you personalised offers or complimentary training or trials. We will also use your address details to send you direct marketing information by post, telling you about our services that we believe may interest you.

## **When do we collect your personal data?**

- When you visit our website and complete our enquiry form or application form
- When you complete an SLA with us
- When you respond to any of our “opportunity” emails
- When you enter employment with us
- When you engage with us on social media
- When you contact us by any means with enquiries or complaints
- When you enter competitions or prize draws through any of our channels
- When you book a meeting with us
- When you choose to complete any surveys, we send you
- When you comment on or review our services via any channel
- When you have given a third-party permission to share information with us

We collect data from publicly-available sources when you have given consent to share information, uploaded your own information to a publicly available source or where information is made public as a matter of law

## **What type of information do we retain on file?**

### **Schools:**

- Your first and last name
- School name
- School telephone number
- Mobile number (if provided)
- E-mail address for an individual in school or school e-mail
- Finance e-mail (bursar or business manager)
- An encrypted record of your log-in password for our sites and software
- An encrypted record of children’s names in class lists that you have uploaded to our software for assessments purposes only
- Details of any interactions or conversations with our team
- Information gathered by the use of cookies in your web browser
- Personal details which help us to recommend services of interest

### **Community Clubs/Societies:**

- Chairman, Secretary and committee members first and last name(s) as applicable
- Community Club/Society name
- Club/Society telephone number
- Mobile number (if provided)
- E-mail address for an individual in club/society e-mail
- Finance e-mail (business manager/secretary)
- An encrypted record of your log-in password for our sites and software
- An encrypted record of children’s names in club lists that you have uploaded to our software for assessments purposes only
- Details of any interactions or conversations with our team
- Information gathered by the use of cookies in your web browser
- Personal details which help us to recommend services of interest

## **Coaches:**

- Your first and last name
- Address
- NI number
- Bank details
- Telephone number(s) provided
- DBS number and issue date
- Nationality
- Vetting form (details you gave consent for when completing application form)
- An encrypted record of your log-in password for our software
- Details of any interactions or conversations with our team
- Personal details which help us to recommend opportunities of interest
- Copies of documents you provide during application process

## **Why do we use your personal data?**

We want to make all coaches/coach educators on file aware of any new opportunities that arise that may be of legitimate interest to them. We also want all schools on file aware of any new services we offer or any changes in availability for services in their area. We only store personal information that allows us to function as a business.

The data privacy law allows this as part of our legitimate interest in understanding our clients and teachers and ensuring that all opportunities are offered to all educators and that none are prioritised or discriminated against.

It is important that you are aware that if you choose not to share your personal information with us, we may not be able to provide some services that you require. For example, if you have asked us to contact you if any “Art work” becomes available in “Luton”, we will not be able to if you have withdrawn your general consent for us to contact you.

## **How do we process your data?**

We process your data if you are a new coach/coach educator that has signed up to us in order for us to contract you to work. We also process your data if you are a new school that has enquired or signed their SLA in order for us to provide you with a coach/coach educator, monitor that provision and charge your school for that provision.

We know how much data protection matters to all of our potential coaches/coach educators, schools, community clubs/societies and all of our existing coaches/coach educators, schools and community clubs/societies. For this reason, your data is treated with care and precision.

All our client and employee data is stored in our web-based CRM all of our manual systems and data ecosystems are constantly updated, reviewed and amended (if necessary).

Your data will only be used to communicate with you regarding your provision and will not be shared with third parties.

## Who will we share your data with?

- If you are a coach/coach educator, the school(s), community clubs/societies you are working in on our behalf
- If you are a school, your data will be shared with the coach/coach educator(s) we contract for your school
- If you are a community club/society, your data will be shared with the coach/coach educator(s) we contract for your club/society
- We may share your details with third parties if there is ever the need to outsource any of our work to other organisations. These organisations will always comply with our Data Privacy Notice and your data will be treated in the same way.

## Your rights over your personal data:

### Subject access requests

- You can make a '**subject access request**' ('SAR') to find out the information we hold about you. This request must be made in writing. When we receive such a request, we will forward it immediately to the Data Protection Officer/Data Protection Manager who will coordinate a response.
- If you would like to make a SAR in relation to your own personal data, you should make this in writing to Primary Influence UK Ltd (Gareth Hanson). We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.
- There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request.

### Your data subject rights

- You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- You have the right to access your own personal data by way of a subject access request (see above).
- You can correct any inaccuracies in your personal data. To do so you should contact Gareth Hanson [gareth@primaryinfluence.co.uk](mailto:gareth@primaryinfluence.co.uk)
- You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact Gareth Hanson [gareth@primaryinfluence.co.uk](mailto:gareth@primaryinfluence.co.uk).
- While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact Gareth Hanson [gareth@primaryinfluence.co.uk](mailto:gareth@primaryinfluence.co.uk)

- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
- You have the right to object if we process your personal data for the purposes of direct marketing.
- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- With some exceptions, you have the right not to be subjected to automated decision-making.
- You have the right to be notified of a data security breach concerning your personal data.
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact Gareth Hanson [gareth@primaryinfluence.co.uk](mailto:gareth@primaryinfluence.co.uk)
- You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner's Office directly. Full contact details including a helpline number can be found on the Information Commissioner's Office website ([www.ico.org.uk](http://www.ico.org.uk)). This website has further information on your rights and our obligations.

To ask for a copy of the information we hold about you, please contact:

Gareth Hanson  
Managing Director  
Primary Influence UK Ltd  
4 Bramley Park Avenue  
Sherburn in Elmet  
Leeds  
LS25 6FA

[gareth@primaryinfluence.co.uk](mailto:gareth@primaryinfluence.co.uk)