

# Privacy Policy

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Welcome to Belbin. This Privacy Policy explains what we do with your personal information when you visit our website. It describes how we collect, use and process your personal information. Your privacy is important to us and we are committed to protecting and safeguarding your rights.

## 1. Introduction

For the purpose of the UK GDPR, Belbin, whose registered office is at 3-4 Bennell Court, West Street, Comberton, Cambridge, CB23 7EN, UK (“us”, “we” or “our”) acts in two different capacities – as a data controller when you are visiting our website or completing reports as part of our Belbin training courses, and as a data processor when we process your data as part of a service provided to your employer or another organisation you are affiliated with.

Please refer to the end of this Policy for our contact information.

We may amend this Privacy Policy from time to time by posting an updated version on our website.

## 2. Information we collect about you

This Privacy Policy governs how we collect and process your data across all of our sites (“Sites”).

We will use and process your personal information, where you have requested us to do so, for the following purposes:

- a) to register you as a user of our Site;
- b) to provide you with online testing inventory services as requested by you;
- c) to comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- d) to manage queries, complaints, or claims; and
- e) to obtain feedback and reviews regarding in relation to your customer experience, with a view to improving our products and services; and
- f) for marketing purposes (where you have provided us with your consent).

# Privacy Policy

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process your order online  (a) Manage payments, fees and charges  (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)
To complete the Belbin assessment through our web application.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you
To send through your Belbin report.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you
To manage our relationship with you, which will include notifying you about changes to our terms or privacy policy.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (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 enable you to complete a survey.	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer this website (including troubleshooting, data analysis, testing,	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network

# Privacy Policy

system maintenance, support, reporting and hosting of data).	(c) Technical	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 deliver direct marketing to you, in accordance with your consent (where consent is required); to measure or understand the effectiveness of the advertising we serve to you; to maintain a suppression list where you have opted-out of marketing communications.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Consent (in respect of delivery or marketing or advertising to you, for which your consent is legally required)  (b) Necessary for our legitimate interests (to study how customers use our products/services and to develop them; to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, app, 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)

### 3. DIRECT MARKETING

We carry out direct marketing activities where you have registered to receive our newsletter, which will be sent via email.

You can opt out of receiving these communications at any time by clicking on the unsubscribe link or by emailing [privacy@belbin.com](mailto:privacy@belbin.com)

### 4. Sharing your information with third parties

Your data is also accessible to our server providers and contractors who have data protection agreements in place with us, and will be anonymised when used for research purposes.

# Privacy Policy

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As part of our research, we may also share collated, anonymised data publicly. Your email address will be shared with TrustPilot for the purposes of obtaining a review of your purchase and experience with us.

## 5. How we store your information

### A) Website

Information gathered via [www.belbin.com](http://www.belbin.com) for marketing purposes is held by suppliers in the USA, including marketing and CRM service providers. Our suppliers are bound by a Data Protection Agreement that complies with applicable data protection laws.

Our external marketing and website support providers (based in the UK) may require access to your data in order to carry out work on our behalf.

### B) Payment Information

To fulfil your order, we may also need to hold your information on our accounts, payment and courier service providers in the USA and New Zealand.

### C) Belbin Report

All personal information that is collected and processed through the Belbin web application when completing an assessment, is stored on our secure servers located within the UK for up to three years.

## 6. International Transfers outside Europe

Due to the international nature of our business, there may be some instances where your information is processed or stored outside of the UK and EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable data protection law.

## 7. How we safeguard your information

We take steps to ensure that any third-party partners who handle your information comply with data protection legislation.

# Privacy Policy

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We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated non-specific data sets wherever possible.

Our Sites have security measures in place to protect the loss, misuse, accidental or unlawful destruction or unauthorised access of the information under our control. All pages that contain personal information are password-protected.

## 8. Your Rights

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

- a) Right to access your personal information: You have the right to request a copy of the personal information that we hold about you, and request us to modify, update or delete such information. However, you should be aware that where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will always tell you the reasons for doing so.
- b) Right to rectification: You have the right to request that we rectify any inaccurate or incomplete personal information that we hold about you.
- c) Right to erasure: You have the right to request that we erase your personal information in certain circumstances. We would only be entitled to refuse to comply with your request for erasure in limited circumstances and we will always tell you our reason for doing so. When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.
- d) Right to object to, and/or restrict, processing: You have the right to object to, or restrict our processing of, your personal information in certain circumstances. We will stop such processing unless we can demonstrate compelling legitimate grounds for the processing which overrides your interests or if the processing is necessary for the establishment, exercise or defence of legal claims.
- e) Right of data portability: You have the right to transfer your personal information between service providers where we rely on your consent or the performance of your contract as the lawful basis to use that information.

# Privacy Policy

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- f) Right to withdraw consent: Where we have obtained your consent to process your personal information for certain activities, you may withdraw this consent at any time by contacting us on the details in the 'Contact Us' section below.

If you wish to exercise any of the rights set out above, please email: [privacy@belbin.com](mailto:privacy@belbin.com).

## **Right to complain to the ICO**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://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.

## **9. How to contact us**

If you have any queries about this Privacy Policy, including your rights in relation to your personal information, please contact us at: [privacy@belbin.com](mailto:privacy@belbin.com).

**Last updated: March 2023**