



This Privacy Notice governs the manner in which BLEND Associates Limited collects, uses, maintains and discloses Personal Data. Blend Associates Limited is a company registered in England (company no. 08815945) and with its registered address at 217a Newmarket Road, Norwich, NR4 7LA, England (“BLEND”).

By “**Personal Data**” we refer to information collected or held by BLEND, that identifies and relates to you as an individual.

BLEND understands the importance of protecting the Personal Data you provide to us. This Privacy Notice sets out what Personal Data we hold, the appropriate safeguards we put in place to protect your information and the rights available to you in relation to this information.

BLEND is the data controller (‘data controller’ having the meaning set out in the Data Protection Act 2018, the UK General Data Protection Regulations (Retained Regulation (EU) 2016/679) and, to the extent that it is applicable to the United Kingdom, the General Data Protection Regulation (EU 2016/679)) in respect of any Personal Data you may provide to us or any Personal Data provided to us by a third party in the course of our business operations.

We confirm that any Personal Data we hold on your behalf will be held in accordance with the registration we have with the Information Commissioners Office. Our current registration number is: ZA131985.

Information collected

We collect the following information:

- information you provide directly to BLEND via the contact page on the website:
 - Name;
 - Email address; and
 - Any supplementary information you volunteer in your initial contact;
- when you communicate with us directly in person or via another form of communication for customer service or other purposes (e.g. by emails, phone calls, tweets, etc.), we retain such information and our responses to you in the records of your account;
- as part of any survey you complete via the ‘Smart Survey’ tool. We will provide you with notice of how the information will be used prior to your participation;
- coachee information as part of a questionnaire from the Blend automated coach matching platform (“**Platform**”), which may include a coachee’s:
 - Name;
 - Contact telephone number;
 - Email address; and
 - Any supplementary information you volunteer in your initial contact (Which may include medical information;
- information that you populate in the Blend platform, which may include your:
 - Names;
 - Address;
 - Email address;
 - Contact telephone number;
 - Equality and diversity information (gender, disability etc); and
 - for coaches only:
 - age range;
 - ethnicity; and
 - a photograph;
- information related to professional development collected during participation in coaching sessions as part of our service provision; and
- information related to the Myers-Briggs Type Indicator collected via online self-reporting survey tools. These providers have their own privacy policies which will apply. For more information, please see the Myer Briggs Company privacy policy by clicking on this link [Privacy Policy \(themyersbriggs.com\)](https://www.themyersbriggs.com/privacy-policy) and/or Prophets Data Policy by clicking on this link [PROPHET-Data-and-Privacy-Policies.pdf \(prophetprofiling.com\)](#).



Use of Personal Data

We process Personal Data collected for the purposes of:

- responding to your requests and communicating with you;
- enabling us to provide the coaching or strategy service we have been contracted to perform;
- making available the Platform for managing and tracking coaching sessions;
- carrying out customer and marketing research; and
- improving our website and ensuring it runs smoothly.

We never sell Personal Data collected or use your Personal Data for any other purposes than those stated above.

All of the above purposes are conducted for the reason of performing a contract to which BLEND has been engaged by a client. Where we request consent for collection of information, we will always ensure you are notified of your rights in relation to this information (please see the 'Personal Data and your rights' section below).

We use the Platform to undertake a limited form of automated decision-making based on coachees' replies to the Platform questionnaire (in order to match coachees with coaches), however, a human determination is always the final stage of the selection process. If you do not agree with your information being automatically processed in this way, please email info@ltdblend.com.

Sharing your Personal Data

If you are an employee of a Blend client and have provided Personal Data directly to us as part of our coaching or strategy service, it is intended that this information will be shared with relevant Blend client unless explicitly agreed otherwise.

We may use carefully selected sub-processors to help us collect, store or manage your information. This includes sharing data with Blend's IT support service provider and Blend's software developers for development purposes in relation to the Blend Platform.

Where you have agreed to receive marketing information, we may use a third party to provide you with these updates and promotions.

We may disclose your Personal Data to a statutory body when we are under a legal obligation to do so.

All of the information we collect is held in servers locally or in data centres located within the UK or the EEA. We do not transfer any of your information outside of the UK or the EEA at any time.

Security

BLEND takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Notice. We shall take all reasonable steps to protect your Personal Data from accidental or unauthorised access, alteration, loss, destruction or disclosure.

All the Personal Data collected by us and stored electronically is held on a secure server in the UK or the EEA only. Where required, this information is encrypted for additional security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

Retaining your Personal Data

We will only retain your Personal Data for as long as is necessary to perform the purpose for which it was collected.

As standard we only collect information to enable us to complete the time limited specific contract we have been engaged to perform. Once we submit the final report to the client, our practice is to erase all Personal Data that we no longer need unless required by law to retain for a longer period.

Personal Data and your rights

You have rights in relation to any Personal Data that we hold about you. If you wish to access your Personal Data you may make a formal subject access request by contacting BLEND.

The information you request must relate to you or another person that you have authority to act on their behalf. BLEND will require a confirmation of your ID prior to providing any information about the data we hold. If you are unable to provide sufficient information to prove your ID, BLEND reserves the right to refuse your request for access to Personal Data. The rights you have in relation to the Personal Data we hold regarding you are:

- the right to rectify any inaccuracies in the information we hold;
- the right to erasure of information in specific circumstances;
- the right to request transfer of your information to another controller; and
- the right to object to processing in specified circumstances.

If you have provided us with consent to process your information, you always reserve the right to withdraw this consent via the method detailed in the paragraph below. We are committed to ensuring that your wishes are respected and upon notification that you wish to withdraw your consent, BLEND will immediately cease processing the information in question.

Please send your request to BLEND by emailing: admin@amandareynolds.com. We will always process your request within one month.

Questions about this Privacy Notice

If you have any questions or complaints regarding how BLEND has handled your Personal Data, please don't hesitate to contact us at amanda@amandareynolds.com.

If you feel your request has not been dealt with in an appropriate manner, you can register your complaint with the UK data protection authority (the Information Commissioner's Office) via their contact page: <https://ico.org.uk/>.

Confidentiality

For further clarification, but without prejudice to the preceding clauses of this clause 8, the following provisions apply to any Confidential Information that is processed by BLEND or the Service Provider in relation to customers, employees, sub-contractors and coaches ("Disclosers") from time to time:

- the ability to have confidential discussions with Disclosers is an integral part of BLEND's services;
- all coaching relationships (and any information communicated in writing or orally as part of such relationships) will be subject to confidentiality obligations set out in the EMCC Association of Coaching and/or IFC Code of Ethics;
- such coaching relationships are not protected by legal professional privilege or patient-doctor confidentiality obligations and no implied duty of confidentiality of legal privilege applies in relation to any Confidential Information. Consequently, all Confidential Information is protected on a contractual basis only;
- except as provided in this Agreement or otherwise agreed with the Discloser from time to time, each coach will not disclose any Confidential Information to any third party (including their employer) without the applicable Discloser's prior written consent;
- except to the extent required by law, no Discloser will be named to any third party;
- no Confidential Information will be shared electronically unless access to that Confidential Information is subject to controlled access restrictions; and
- all written records, assessments and reports will be stored in a reasonably secure manner after each coaching session. Such documents will only be retained for the period reasonably required by BLEND (in accordance with the applicable coaching body requirements).

Nothing in the above section will prevent BLEND from using or disclosing any Confidential Information which:

- is in or comes into the public domain in any way (without breaching any contract between the parties) by BLEND or any person or entity to whom it makes disclosure;
- BLEND can show was: (i) in its possession or known to it by being in its use or being recorded in its files prior to receipt from the Discloser and was not acquired by BLEND from the Discloser under an obligation of confidence; or (ii) to have been independently developed by BLEND without reference to the Confidential Information;
- BLEND obtains or has available from a source other than the Discloser without breach by BLEND or such source of any obligation of confidentiality or non-use;
- is disclosed by BLEND with the prior written approval of the Discloser; or
- is required by law to be released (e.g. by a court order), provided that, when permitted by the applicable law, the Discloser is given as much prior written notice as possible of such request.

Confidential Information from a Discloser may also be disclosed to legal authorities or any reasonably required third party where a coach reasonably considers that there is, or could be, an immediate risk, or likely risk, of danger or harm to the Discloser or any third party and/or the Confidential Information relates to illegal activity (which includes without limitation, terrorism and/or money laundering).

Changes to this Privacy Notice

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Information.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

Last updated: December 2022

