

Wavelength Privacy Policy

Wavelength Companies Ltd, trading as Wavelength (“Us”, “We”, “Our”), is a limited company in the UK. Our registered address is Oakhurst, Chiltern Road, Ballinger, Great Missenden, Buckinghamshire, HP16 9LJ.

This policy is intended to give you an understanding of how and why we use the information you provide to us both online, through our website domains located at: (1) wavelengthleadership.com; (2) wavelengthinspire.com; (3) wavelengthconnect.com; and (4) wavelengthspeakers.com (the “**Website**”) and otherwise.

We respect your privacy and are committed to protecting your personal data We want to demonstrate this commitment to your privacy by informing you how we look after your personal data when you visit our Website.

This Privacy Policy answers the following questions on your privacy rights and how the law protects you:

- 1. What information do we collect about you?**
- 2. How will we use the information about you?**
- 3. Marketing Communications**
- 4. Our Legal Basis for processing data**
- 5. Will we share this information with others?**
- 6. How do we protect the security of personal data?**
- 7. How long do we keep your data for?**
- 8. Your privacy rights**
- 9. How will we let you know of changes to our Privacy Policy?**
- 10. How to contact us**

Please read this policy carefully to understand how we will collect, use and store your data.

Wavelength Companies Ltd is the controller of your personal data and is responsible for your personal data. Questions regarding this Privacy Policy should be directed to Us by sending an email to Jessica@wavelengthleadership.com. Please write ‘Privacy Policy’ in the subject line.

1. What information do we collect about you?

This Privacy Policy aims to give you information on how We collect and process your personal data through your use of our Website. We collect personal data about you for a number of reasons, including communicating with you regarding our programmes, responding to requests for information, and to provide you with access to our resources.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). The personal data we collect can include:

- your full name;
- job title;
- postal address;

- email address;
- your profile photo, profile name and personal meeting ID;
- audio and/or visual recordings of Wavelength online events and programmes;
- content you add to your profile for an Wavelength online event or programme;
- preferred and emergency telephone numbers;
- dietary and health requirements^[1];
- passport details;
- travel insurance details;
- records of your correspondence with us;
- information you may enter via email, text, the Website, Dropbox and GoogleDocs; and
- other information you share with us.

We also collect information about the use of our website using cookies (see the [Cookies Notice](#) for more information).

There is also information about your computer hardware and software that is automatically collected by us. This technical information can include: your IP address (the unique identifying number of a computer), the browser you use, for example Internet Explorer, Firefox etc., domain names, access times and referring Website addresses. We use this information for the operation of the service, to maintain and improve the quality of the service, and to provide general statistics regarding use of the Website.

We (or our contractors and agents) may also photograph, video, or film (“**image(s)**”) you at our events (both our in-person and online events) and these images may identify you and therefore constitute personal data. We (or our contractors and agents) may use the images in any form of media, including the internet. We do this for marketing purposes including event promotion and product development and for the purpose of making our online events available to our members to watch on demand (where our members have paid for this service). In attending our events, you waive any and all right to notification, compensation, inspection or approval in relation to the image(s).

Please note that our Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the Privacy Policy of every website you visit.

2. How will we use the information about you?

We will process your data for the following reasons:

1. To deliver services, materials and other information you have requested from us;

2. To provide you with information regarding our programmes, including Wavelength Connect, Wavelength USA, Wavelength Bespoke, Wavelength Inspire, Wavelength's Global Tours, Wavelength's eSpeakers Hub and any other Wavelength programmes;
3. To send you updates about our work and research, along with information on future programmes etc.
4. To allow access to our resources and online learning platforms;
5. For our own internal administrative purposes and to keep a record of your relationship with us;
6. To manage your communication preferences;
7. To conduct surveys, research and gather feedback on our programmes^[2];
8. To produce reports and studies based upon our activities^[3] (only anonymised data to be included in the publication unless consent is given);
9. To comply with applicable laws and regulations, and requests from statutory agencies; and
10. Where it is otherwise necessary for our legitimate interests, (or those interests of a third party) and your interests and fundamental rights do not override those interests.

3. Marketing Communications

We would love to keep you up to date with our services and resources. We will only do so where you have agreed to receive this information. We send the following types of marketing material:

- Updates about our programmes and events including newsletters and other publications;
- Invitations to participate programmes and events; and
- Information about additional tools and resources which we think you might find interesting.

You can opt-out or update your communication preferences at any time by contacting us by sending an email to Jessica@wavelengthleadership.com. Please write 'Opt Out' in the subject line when contacting us in this way. Any electronic communications we send to you will have a link to unsubscribe from future electronic communications, so you can easily manage your own consent.

If you tell us you do not wish to receive marketing communications, you may still receive administrative communications.

4. Our Legal Basis for processing data

Organisations that collect and use personal data must have a lawful basis for doing so under data protection law and we are required to let you know the lawful basis on which we rely to process your personal data. We rely upon the following lawful bases:

- Obtaining your consent to use your data for a particular purpose (for example to send you direct marketing by email or to collect sensitive personal data);

- Where the use of the data is in our “legitimate interests” (see below for more information);
- Where we need to process your data in order to perform our obligations under a contract that we have entered into with you (for example to provide you with access to resources); and
- To process data where we are under a legal obligation to do so.

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, as long as its use is fair and does not adversely impact the rights of the individual concerned. When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair. Our legitimate interests include:

- *General administration and operational management*, including registering you as a new delegate or client, invoicing and processing of payment, debt collection;
- *Relationship management*, including notifying you of changes to our terms of trading, asking you to leave a review or take a survey;
- *Website and business administration*, including troubleshooting, data analysis, testing, system maintenance, support, and hosting of data;
- *Data analytics* to develop our business and to inform our marketing strategy;
- *Making suggestions and recommendations* about products/services that may be of interest to you.

If you would like more information on our uses of legitimate interests or to change our use of your personal data in this manner, please get in touch with us by sending an email to Jessica@wavelengthleadership.com.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

5. Will we share this information with others?

We do not share, sell or rent your information to third parties for marketing purposes.

When using the Website to communicate with Wavelength members, certain information may be shared with them. This information may include profile information (for example your profile name and photo, your name and email address) and any information you choose to share when communicating with Wavelength members.

We will not otherwise disclose your personal information unless required to do so by a regulatory agency or law.

We may allow our employees, associates and/or external providers (data processors) acting on our behalf to access and use your information for the purposes for which you have provided to us (e.g. to analyse data and to process payments). We only provide them with the information they need to

deliver the relevant service, and ensure that we take steps to ensure that they process personal data in a secure manner.

6. How do we protect the security of personal data?

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred via the internet. If you have any particular concerns about your information, please contact us.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

The information we collect from you may be transferred to and processed and/or stored at certain countries and territories outside the UK, namely: Israel, the EU, the USA and India.

If we send your personal data outside the UK, we will ensure a similar level of protection afforded to it, by ensuring that We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. How long do we keep your data for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

With regard to data collected as part of a programme or other event (e.g. dietary requirements and emergency contact details), our usual policy is that within six weeks of the end of the programme, such data is cleansed from computers, laptops, iPhones, iPads, YAP (our CRM system), Dropbox, GoogleDocs, and anywhere else it is stored. Any data that is recorded in hard copy is also securely disposed of.

Once you no longer have a relationship with us, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list in order to avoid sending you unwanted materials in the future.

8. Your privacy rights

You have a number of rights under data protection legislation. These include:

- **Right of access**

You have the right know what information we hold about you and to ask, in writing, to see your records. We will provide you with details of the records we hold as soon as possible and at latest within one month, unless the request is complex. We may require proof of identity before we are able to release the data. Please contact us by sending an email to Jessica@wavelengthleadership.com if you would like to exercise this right.

- **Right to be informed**

You have the right to be informed how your personal data will be used. This Privacy Policy as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

- **Right to withdraw consent**

Where we process your data on the basis of your consent (for example, to send you marketing texts or e-mails) you can withdraw that consent at any time. To do this, or to discuss this right further with us, please contact us by sending an email to Jessica@wavelengthleadership.com.

- **Right to object**

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post). To do this, or to discuss this right further with us, please contact us by sending an email to Jessica@wavelengthleadership.com.

- **Right to restrict processing**

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

- **Right of erasure**

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials we will need to keep some limited information in order to ensure that you are not contacted in the future.

- **Right of rectification**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. To update your records please get in touch with us by sending an email to Jessica@wavelengthleadership.com.

- **Right to data portability**

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

It is also important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Complaints

If you are unhappy with the way in which we have handled your personal please get in touch with us by sending an email to Jessica@wavelengthleadership.com.

You are also entitled to make a complaint to the Information Commissioner's Office ("ICO") (<https://ico.org.uk>) – however we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

9. How will we let you know of changes to our Privacy Policy?

We keep this Privacy Policy under regular review and may update it from time to time without notice to you, so please check it regularly. We will however aim to bring any significant changes to your attention.

10. How to contact us

Please contact us if you have any questions about our Privacy Policy or information we hold about you:

By phone: + 44 (0) 7966 501 886

By e-mail: Jessica@wavelengthleadership.com

[1] Where we collect sensitive personal data about you, such as health information, we will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law. For example, we may make a record that a person has particular access requirements.

[2] Our surveys are usually always anonymised.

[3] Again, we only use anonymised data in any resulting publication unless we have your explicit permission.