

Privacy Notice

Last updated: 27 July 2021

This notice tells you how we look after your personal data when you visit our website at <http://georginacavaliere.com/> (**Website**) or when you access and use our leadership advisory and management due diligence services (together, the **Services**).

We may sometimes need to update this notice, to reflect any changes to the way the Services are provided or to comply with new legal requirements. We will notify you of any important changes before they take effect.

1. Who we are and other important information

We are Georgina Cavaliere Advisory Ltd, registered in England and Wales with company number 11148565 (**GCLA, we, us or our**).

For all visitors to our Website, GCLA is the **controller** of your information. We are registered with the Information Commissioner's Office (**ICO**), the UK regulator for data protection matters, under number ZA704206. If you work for an organisation which is our customer (**Customer**) and they give you access to our Services, our Customer is the **controller** and we are their **processor**.

If you have any questions about this privacy notice or the way that we use information, please contact us at gc@georginacavaliere.com.

2. The information we collect about you

We collect following type of personal data from you and the Customer:

- **Identity Data** – name, date of birth, job title, gender, age, ethnic origin;
- **Contact Data** – email address, telephone numbers, home address;
- **Communication Data** – correspondence between you and us;
- **Feedback** – information and responses you provide when completing surveys and questionnaires;
- **Psychometric Questionnaire Data** – psychometric questionnaire answers or benchmarking data;
- **Technical and Usage Data** - information about your visit to our Website and internet protocol address, browser type, operating system and platform on the devices you use to access our Website;
- **Employment Data** – education, work history and experiences; and
- **Health Data** – information you share with us about absences from work or mental health status.

3. How we use your information

We use your personal data to:

- fulfil our **contract** with you (where you are an individual that contracts with us directly and not via an organisation);
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms;
- comply with a **legal obligation** that we have; and
- do something for which you have given your **consent**.

4. Who we share your information with

We share (or may share) your personal data with:

- **Our team:** GCLA employees (or other types of workers) who have contracts containing confidentiality and data protection obligations;
- **Our Customers:** we have a service contract and data processing agreement in place with all our Customers which sets out what information we provide to them as part of our Services;

- **Our supply chain:** other organisations help us provide our Services. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations;
- **Regulatory authorities:** such as HM Revenue & Customs; and
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business.

If we were asked to provide personal data in response to a court order or legal request, we would seek legal advice before disclosing any information and consider the impact on your rights when providing a response.

5. Where your information is located or transferred to

We will only transfer information outside of the UK where we have a valid legal mechanism in place. If you use our Services because you have been registered by an organisation or access our Services whilst abroad then your personal data may be stored on servers located in the same country as you or your organisation.

6. How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include internal IT and network security, regular review of our security measures, staff training, incident and breach reporting processes.

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law). Where we act as the processor for the affected personal data, we notify the controller and support them with investigating the incident.

7. How long we keep your information

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We may keep Identity Data, Contact Data and certain Communications Data for up to six years after the end of our contractual relationship with you or your organisation. If you are not a Customer and you browse our Website, we keep personal data collected through our analytics tools for only for as long as necessary to fulfil the purposes we collected it for.

8. Your legal rights

You have specific legal rights in relation to your personal data. It is usually free for you exercise your rights and we aim to respond within one month. We can decide not to take any action in relation to a request where we have been unable to confirm your identity or if we feel the request is unfounded or excessive. If this happens, we will always inform you in writing. However, if we decide to proceed with such request, we may charge a fee.

We do not respond directly to requests which relate to personal data for which we act as the processor. In this case, we forward your request to the relevant controller and await their instruction before we take any action.

Your legal rights in respect of your personal data include:

- **Access:** You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it;
- **Correction:** You can ask us to correct your personal data if it is inaccurate or incomplete;
- **Deletion:** You can ask us to delete or remove your personal data if there is no good reason for us to continuing holding it or if you have asked us to stop using it. If we think there is a good reason to keep the information you have asked us to delete, we will let you know and explain our decision;
- **Restriction:** You can ask us to restrict how we use your personal data;
- **Objection:** You can object to us using your personal data. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision;
- **Portability:** You can ask us to send you an electronic copy of your personal data; and
- **Complaints:** If you are unhappy with the way we collect and use your personal data, you may wish to reach out directly to the ICO or another relevant supervisory body.

If you wish to make any of the right requests listed above, please contact us at gc@georginacavaliere.com.

9. Our cookie policy

Our Website uses performance cookies. Performance cookies help us to understand and analyse how our Website visitors use our Website. The cookies we use are:

- **dps_site_id** - used for optimising the speed and performance of our Website – lasts a session;
- **_tccl_visitor** - used for monitoring the usage performance on our Website – lasts 1 year; and
- **_tccl_visit** - used for monitoring the usage performance on our Website – lasts 30 minutes.

We can only use cookies with your permission. You can choose to decline cookies but if you turn off necessary cookies, some pages and functions on our Website may not work properly. You can also manage cookies through your browser settings or device settings or delete cookies directly with the relevant third parties.