

# Privacy Policy



## Introduction

We take your privacy very seriously and we are committed to protecting your personal data. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website and platform which allows individual coaches with executives and professionals (our **services**). It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint. This privacy policy supplements other notices and privacy policies and is not intended to override them.

We collect, store, use and share your personal data and when we do so we are subject to General Data Protection Regulation (EU) 2016/679, as it forms part of domestic law in the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 (including as further amended or modified by the laws of the United Kingdom or of a part of the United Kingdom from time to time) (**UK GDPR**), the Data Protection Act 2018, and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended or modified by the laws of the United Kingdom) (**PECR**).

The above data privacy laws are the operative laws applicable to our collection, storage, use and sharing of personal information. These data privacy laws have extra-territorial scope, which, in simple terms, means that we shall afford the same level of protection required under such data privacy laws to data subjects no matter where the data subject resides.

## Key Terms

<b>We, us, our</b>	<b>Work &amp; Grow</b> , the trading name of <b>Jeja Holdings Ltd.</b>
Our data privacy manager	Mr James Brookner
Address	Work & Grow, No.15, 7 Alfred Street, London, E3 2BE.
Personal data	Any information relating to an identified or identifiable individual.
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs, trade union membership, genetic data, biometric data (where used for identification purposes), and data concerning health, sex life or sexual orientation.
Data subject	The individual who the personal data relates to.

Our website [www.workandgrow.co](http://www.workandgrow.co) and platform is provided by **Work & Grow** which is the trading name of **Jeja Holdings Ltd** of No.15, 7 Alfred Street, London, E3 2BE and is the controller responsible for your personal data ("**Work & Grow**", "**we**", "**us**" or "**our**" in this privacy policy).

We have developed a marketplace and social interaction software and associated website and web hosting platform to connect individual coaches with executives and professionals to help professionals reach their development goals (the '**Platform**').

Our Platform 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.

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review and therefore we may change this privacy policy from time-to-time – when we do, we will inform you by publishing the policy on our website.

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

### **Personal data we collect about you**

We may collect, use, store, and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- **Contact Data** includes billing address, delivery address, email address and telephone numbers;
- **Financial Data** includes bank account and payment card details;
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- **Usage Data** includes information about how you use our website, products, and services; and
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not record, process, store, or transfer any **Special Categories of Personal Data**. In the event that you disclose to us such data, you give us your explicit consent to record, process, store, and transfer such data in accordance with this policy. If you do not give your consent, but you share this data with us, we may process such information where we have a lawful basis for doing so and only where it is necessary for the purpose of providing you with the Platform.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to connect you with other Platform users to provide or receiving coaching services). In this case, we may have to close your account, and we reserve the right to do so in our sole and absolute discretion, to ensure that we remain in compliance with applicable data privacy laws.

## How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms on our Platform or by creating an account on our Platform, or by corresponding with us by post, phone, or email. This includes personal data you provide when you:
  - complete signup forms to register for an account on our Platform.
  - discussions with us for any reason via telephone and email;
  - where you subscribe to our Platform, email notifications or publications; and
  - give us feedback or contact us.
- **Indirect interaction.** We may receive your Identity and Contact Data when it is disclosed to us by another Platform user to whom we provide services to, or a third-party organisation.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below (including, but not limited to):
  - Data from analytics providers such as Google based outside the UK;
  - Platform users (whether they are individuals or corporate entities); and
  - Banks and Financial Institutions in order to validate and verify payments made on our Platform.

## How and why we use your personal data

Under data privacy laws, we can only use your personal data if we have a proper reason, for example:

- Where we have obtained your consent.
- Where we need to perform a contract we enter into with you, to allow us to provide the Platform to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for and why. Please note that we may process your personal data for more than one reason depending on the specific purpose for which we are using your personal data.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract.
To share your personal data with third parties where the sharing is required in order to provide the services to you	To perform our contract with you or to take steps at your request before entering into a contract, or to validate payments made by you.
Conducting checks to identify you and verify your identity Other activities necessary to comply with professional, legal, and regulatory obligations that apply to our business	To comply with our legal and regulatory obligations, including (but not limited to) validating payments made by you.
To enforce legal rights or defend or partake in legal proceedings, including to respond to a request from His Majesty's Courts and Tribunal Service	Depending on the circumstances: <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations; and</li> <li>- in other cases, for our legitimate interests, i.e., to protect our business, interests, and rights.</li> </ul>
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies and our professional advisers	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests, i.e., to make sure we are following our own internal procedures so we can deliver the best Platform to you.
Operational reasons, such as maintaining records, improving efficiency, training, quality control and managing our staff	For our legitimate interests, i.e., to be as efficient as we can so we can deliver the best Platform to you at the best price.
Ensuring the confidentiality of sensitive information	Depending on the circumstances: <ul style="list-style-type: none"> <li>- for our legitimate interests, i.e., to protect trade secrets and other commercially valuable information; and</li> <li>- to comply with our legal and regulatory obligations</li> </ul>
Statistical analysis to help us manage our business, e.g., in relation to the provision of the Platform to our users	For our legitimate interests, i.e., to be as efficient as we can so we can deliver the best service to you at the best price.
Preventing unauthorised access and modifications to systems	Depending on the circumstances: <ul style="list-style-type: none"> <li>- for our legitimate interests, i.e., to prevent and detect criminal activity that could be damaging for you and/or us; and</li> <li>- to comply with our legal and regulatory obligations.</li> </ul>
Protecting the security of systems and data used to provide the services	To comply with our legal and regulatory obligations: We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e., to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us.

Updating and enhancing your records	Depending on the circumstances: <ul style="list-style-type: none"> <li>- to perform our contract with you or to take steps at your request before entering into a contract;</li> <li>- to comply with our legal and regulatory obligations; and</li> <li>- for our legitimate interests, e.g., making sure that we can keep in touch with our customers about existing orders and new products.</li> </ul>
Statutory returns	To comply with our legal and regulatory obligations.
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: <ul style="list-style-type: none"> <li>- to comply with our legal and regulatory obligations; and</li> <li>- for our legitimate interests, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best Platform to you.</li> </ul>
Preventing and detecting fraud against you or us	For our legitimate interest, i.e., to minimise fraud that could be damaging for you and/or us.

**Children**

Our Platform is not intended for children, and we do not knowingly collect data relating to children.

**Change of purpose**

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.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Disclosures of your personal data**

We may share your personal data with the **External Third Parties** as set out in the **Glossary** for the purposes set out above.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **How long your personal data will be kept**

We will not keep your personal data for longer than we need it for the purpose for which it is used. In any event, we shall not store your personal data for longer than 6 years, unless we are compelled to do so by data privacy laws, other legal and statutory instrument, or as directed by a regulatory body.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

## **International Transfers**

Our Platform is open to users worldwide. As a UK organisation, we may transfer your personal data outside of the UK, including to host any personal data collected about you during your use of our Platform, or when browsing our website. We may also collect personal information about you via the cookies on our Platform. For further information about our use of cookies, please see our Cookie Policy.

We may also engage with third parties who transfer your personal data outside of the UK, through your use of our Platform. Where you are a UK data subject, we may engage with third parties who transfer your personal data outside of the UK, and, in such event, we ensure that there are appropriate safeguards in place to protect your rights as required under data privacy laws.

## **Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. We have put in place procedures to deal with any suspected personal data breach and will notify you and the applicable regulator of a breach where we are legally required to do so.



## GLOSSARY

### Lawful basis

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Platform, website and services (as well as the best and most secure experience whilst on our Platform).

We make sure to consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### External Third Parties

We routinely share personal data with:

- Data from analytics providers such as Google based within and outside of the UK;
- Service providers acting as processors who provide IT and system administration services; and
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.

### Your legal rights

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some

cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### **How to contact us**

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us via our '**contact us page**', or alternatively, please write to the data privacy manager using the details set out below.

**Full name:** Mr James Brookner

**Address:** Work & Grow, No.15, 7 Alfred Street, London, E3 2BE.

You have the right to make a complaint at any time to the Information Commissioner's Office (the "**ICO**"), the UK regulator for data privacy 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.