

RiverRhee - Data Protection Policy

Version 1. 24th April 2018

RiverRhee collects personal information from the following three groups of people:

- 1. Course delegates and HR contacts
- 2. MailChimp lists for our newsletters
- 3. RiverRhee Associates

This policy documents what information we collect, for what purpose, how it is retained, and our review and retention practices.

1. Course delegates

We collect delegates' names, email addresses and the name of the company in which they are working at the time that they book for a training course.

We use this information for invoicing purposes, to issue them with course information and pre-work, for inclusion on their course materials and to allocate delegates to course trainers for one-to-one coaching where applicable.

We are also sometimes required to provide course delegate information for Security at course venues.

The course delegate information is retained with the original invoice in electronic form on RiverRhee's FreeAgent accounting account according to FreeAgent's retention policy (available on request).

For some of our courses, delegates complete pre-course questionnaires and Belbin / MBTI profile questionnaires. We share this information with co-trainers on a need to know basis. Paper and electronic versions of pre-course questionnaires are destroyed / deleted immediately after the course.

Belbin and MBTI reports kept on these organisations systems and are subject to their policies (documents available on request).

Photographs are taken during the courses to support our marketing efforts. Names are <u>not</u> associated with photographs. We keep the photos in Dropbox as part of our records for each course, and periodically download these records to CDs.

Course delegates are asked to fill in two further forms during the course: feedback forms on which they are invited (but not obliged) to include their names; and consent forms to support our data protection policy. (These consent forms will be in use from the 1st May 2018 and will be retrospectively sent for completion to anyone attending our courses in April 2018.)

The feedback forms are collated anonymously and used for course improvements and to share with Associates, delegates and HR contacts. The consent forms are scanned and retained in Dropbox with course records (hard-copy is destroyed).

We keep the paper sign-in sheet from the courses, and the individual feedback forms for three years after the course in case of any queries from the parent company, or from bodies with whom we work to accredit our courses (individuals' names are not shared).

The collated feedback is retained in Dropbox with course records. This collated feedback and the consent forms are periodically downloaded with course records to CDs.

After the course we contact the delegates once to share collated (anonymised) feedback from the course, and to give them details of further courses. We also contact them about one month after the course (with their prior agreement) to invite them to participate in a follow-up coaching session.

We keep an electronic spreadsheet of who has attended our Introduction to Management course to support occasional enquiries from the relevant parent company.

We will never forward any of the above information or records to any third party, other than in the ways described above.

2. HR contacts name and e-mail, and company name

We collect HR contact names, email addresses and company names whenever someone from an organisation acts as the contact for arranging training.

We use this information for invoicing, and to share collated information from the courses that their delegates attend. We also share collated feedback from all of our Introduction to Management courses, and share information on up-coming courses on an on-going basis.

The HR contact's information is retained in electronic form on RiverRhee's FreeAgent accounting account according to FreeAgent's retention policy (available on request).

We keep an electronic spreadsheet of the HR contacts who have sent delegates on our Introduction to Management course to support our sharing of information about further courses.

We will never forward any of the above information or records to any third party, other than in the ways described above.

All existing HR contacts will be asked for their consent to this use of their information by 1st May 2018 and from then onwards.

3. MailChimp lists

We use MailChimp mailing lists to manage subscriptions to various newsletters.

Individual that subscribe include course delegates, HR contacts and others who choose to subscribe.

We ask individuals whether they would like to subscribe and if they say yes, we add them to list (this consent is collected in written form at the end of courses, at events, by email); or, people see the newsletter and subscribe to it themselves.

If a name bounces during a newsletter mailing, we look them up on LinkedIn to see if they have changed organisation. We contact them to ask if they would like to re-

subscribe and, if they say yes (by email or via LinkedIn messaging) and so provide their email address, we then re-subscribe them

People can also un-subscribe at any time from the newsletters.

All existing MailChimp newsletter recipients will be asked to actively re-subscribe by 25th May 2018.

4. Associate information

We hold Associate agreements, photos and biography information.

Agreements cover our contractual arrangements in case of any queries. Photos and biographical information are used on our website, as part of trainer information for proposals (where appropriate) and as information supplied to delegates for courses

Agreements are kept in hardcopy and on the main RiverRhee laptop. Photos and biographical information are kept on the website and in Dropbox.

Records are retained for as long as the Associate remains part of the RiverRhee team.

We will never forward any of the above information or records to any third party, other than in the ways described above.

Elisabeth Goodman

Owner (Director) and Principal Consultant

RiverRhee Consulting

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