



• CONNECT • LEARN • GROW •

Privacy Policy

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Your Privacy Matters

Our mission is to help people connect, learn and grow. Central to this mission is our commitment to be transparent about the data we collect about you, how it is used and with whom it is shared.

This Privacy Policy applies when you use our Platform. We offer our Users choices about the data we collect, use and share as described in this Privacy Policy and Cookie Policy.

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/privacy-policy-v1.0.pdf>

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/cookie-policy-v1.0.pdf>

Privacy Policy

This privacy policy (Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law and with a focus on the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities if you would like to report a concern about the way in which we process your data or if you feel a breach has occurred.

Who are we?

Mye-coach Ltd provides an online platform for workplace professionals seeking coaching and/or mentoring.

People use our Platform to find and be found for coaching and mentoring support and to connect with other professional and relevant development Documents.

Our registered Company Number is 5140016 and our registered address is Wessex House, 66 High Street, Honiton, Devon, EX14 1PD. As such our lead authority is the supervisory authority in the state where our main establishment is which is the UK.

We are also ISO/IEC 27001:2013 Certified, with certificate number IS 643968.

What does ISO/IEC 27001:2013 mean?

The official definition from the ISO (International Standards Organisation) reads:

ISO/IEC 27001:2013 specifies the requirements for establishing, implementing, maintaining and continually improving an information security management system within the context of the organisation. It also includes requirements for the assessment and treatment of information security risks tailored to the needs of the organisation. The requirements set out in ISO/IEC 27001:2013 are generic and are intended to be applicable to all organisations, regardless of type, size or nature.

Given the ISO/IEC 27001:2013 scope and the fact that it requires ongoing auditing and certification from an external and independent organisation we hope that our ISO/IEC 27001:2013 Certification provides you with an assurance that we take Data Protection and your privacy very seriously.

However, if you have any queries about this Policy, the way in which mye-coach Ltd processes and controls your personal data, or about exercising any of your rights, please send an email to support@mye-coach.com

Who does this Privacy Policy apply to?

Our Privacy Policy applies to any Member or Visitor to our Platform.

Our registered users (“**Members**”) share their professional identities, engage with other Members and exchange information and Documents with other Members.

Content and data on some of Platform is viewable to non-members (“**Visitors**”).

Platform Services and Documents

This Privacy Policy, including our Cookie Policy applies to the use of our Platform, Documents and any communications we have with you (“**Platform**”).

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/cookie-policy-v1.0.pdf>

Data Controllers and Contracting Parties

If you reside in the UK or EU mye-coach Ltd will be the controller of your personal data provided to, or collected by or for, or processed in connection with our Platform; you are entering into the online User Agreement with mye-coach Ltd.

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/online-user-agreement-v1.0.pdf>

As a Visitor or Member of our Platform, the collection, use and sharing of your personal data is subject to this Privacy Policy (which includes our Cookie Policy and other documents referenced in this Privacy Policy) and updates.

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/cookie-policy-v1.0.pdf>

Change

Changes to the Privacy Policy apply to your use of our Platform after the “effective date.”

Mye-coach (“we” or “us”) can modify this Privacy Policy, and if we make material changes to it, we will provide notice through our Platform, or by other means, to provide you the opportunity to review the changes before they become effective. If you object to any changes, you may close your account.

You acknowledge that your continued use of our Platform after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

1. Data We Collect

1.1 Data You Provide to Us

You need to provide data to create an account with us. You then have a choice of what data you provide to us.

Registration

To create an account, you or your employer need to provide data including your name, organisation, email address and a password.

Once registered you can choose to enhance your mye-coach profile (a complete profile helps you get the most from our Platform).

Profile

You have choices about the information you add to your profile, such as your job title, work level, department, regional location, telephone number/s, social media account details, work experience, qualifications, expertise, education and interests. You don't have to provide any additional information on your profile; however, profile information helps you to get more from our Platform, including helping people to find you. It's your choice whether to include this information on your profile and to who you allow to have visibility of your profile.

Messaging, Requesting, Posting and Uploading Documents

We collect personal data from you when you send a message, fill out a form, (e.g. making a request for coaching and/or mentoring), respond to an evaluation questionnaire, or upload a Document.

You don't have to add any of this personal data; although if you choose not to, it may limit your ability to use fully our Platform.

1.2 Service Use

We log your visits and use of our Platform.

We log usage data when you visit or otherwise use our Platform such as when you view or click on content (e.g. Documents). We use log-ins, cookies and internet protocol ("IP") addresses to identify you and log your use.

1.3 Cookies

We collect data through cookies and similar technologies.

As further described in our Cookie Policy, we use cookies to recognise you. You can control cookies through your browser settings and other tools.

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/cookie-policy-v1.0.pdf>

1.4 Activity Tracking

If you use our Platform, we track your activity.

We collect information about you when you send, receive, or engage with messages in connection with our Platform. For example, if you make a request for coaching, we track whether you have acted on it and will send you reminders.

1.5 Workplace Provided Information

When your employer buys our Platform for you to use, they may give us data about you.

Others buying our Platform for your use, such as your employer will act as an Administrator, provide us with personal data about you and your eligibility to use the Platform that they purchase for use by their employees. This will include name, organisation and email address.

1.8 Other

We continue to improve our Platform, which means we collect new data and create new ways to use data.

Our Platform are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this Privacy Policy.

2. How We Use Your Data

We use your data to provide, support, personalise and develop our Platform.

How we use your personal data will depend on which Platform you use, how you use those Platform and the activity you undertake on our Platform. We use the data that we have about you to provide and personalise, including with the help of automated systems and inferences we make, our Platform so that they can be more relevant and useful to you and others.

2.1 Platform

We use your data to authorise access to our Platform.

Our Platform help you connect with others, find and be found for coaching and/or mentoring opportunities, stay informed, get coached/mentored and be more productive.

Stay Connected

Our Platform allow you to view, message and make a request for coaching and/or mentoring with other Members. To manage this, you can adjust your visibility settings, so you can choose who you want to view or message you.

It is your choice whether to connect with another Member, send them a request for coaching and/or mentoring, or allow another Member to message you. When you make a request for coaching and/or mentoring your request will include your personal request details. We will send the request details and reminders to the person you made the request to.

Stay Informed

Our Platform allow you to stay informed regarding our Platform.

We use the data we have about you (e.g., data you provide, data we collect from your engagement with our Platform and inferences we make from the data we have about you), to recommend relevant Documents and Members of our Platform. For example, if you let us know that you are interested in a certain Topic (e.g. by adding a Topic as a tag), we will use this information to personalise the results of any searches you make, suggest certain Members on our site, or view related Documents to help you towards your development objectives.

We use your content, activity and other data to provide notices to other Members who you have chosen to connect with. For example, a coach and/or mentor that you have requested coaching and/or mentoring from. We may also notify your employers that you have updated your profile, made a new request, completed a coaching/mentoring session/programme, completed a form or not signed in for a given period.

Productivity

Our Platform allow you to search, connect and collaborate with other Members to connect, learn and grow.

Our Platform allow you to communicate with other Members and schedule and prepare coaching and/or mentoring sessions with them.

2.3 Communications

We contact you and enable communications between Members. We offer settings to control what messages you receive and how often you receive some types of messages.

We enable communications between you and other Members through our Platform, including for example messages and requests between Members.

We may need to contact you through email, phone and other ways through our Platform, including messages, push notifications and announcements. We will send you announcements about the availability of our Platform, security, or other service-related issues. You may change your communication preferences at any time.

Please be aware that you cannot opt-out of receiving service messages from us, including security and legal notices.

2.4 Advertising

We **DO NOT** use your data for any advertising or direct marketing purposes.

2.5 Marketing

We may promote our Platform to you.

We use data and content about Members for invitations and communications promoting membership and network growth, engagement and our Platform.

2.6 Developing Platform and Research

We develop our Platform and conduct research.

Service Development

We use data to conduct research and development for the further development of our Platform to provide you and others with a better, more intuitive and personalised experience, drive membership growth and engagement on our Platform, and help connect Members to each other in order to help them learn and grow.

Other Research

We seek to create an environment for Members to help them be more productive and successful.

We use the personal data available to us to research workplace coaching and mentoring trends. In some cases, we work with your employer and trusted third parties to perform this research, under controls that are designed to protect your privacy. We only publish or allow others to publish these insights, presented as aggregated data rather than personalised data.

Evaluation Questionnaires

Evaluation questionnaires are conducted through our Platform. You are not obligated to respond to these Evaluation questionnaires and you have choices about the information you provide.

2.7 Customer Support

We use data to help you and fix problems.

We use the data (which can include your communications) to investigate, respond to and resolve complaints and Service issues (e.g., bugs).

2.8 Aggregate Insights

We use data to generate aggregated insights.

We use your data to produce and share aggregated insights that do not identify you. For example, we may use your *data* to generate statistics about our members and their activity to record Member or Service insights.

2.9 Security and Investigations

We use data for security, fraud prevention and investigations.

We use your data (including your communications) if we think it's necessary for security purposes or to investigate possible fraud or other violations of our User Agreement or this Privacy Policy and/or attempts to harm our Members or Visitors.

<https://s3-eu-west-1.amazonaws.com/myecoach-public/termsandconditions/online-user-agreement-v1.0.pdf>

Breaches

We have the right procedures in place to detect, report and investigate a personal data breach.

In our capacity as data processor, we have measures in place to detect system-based data breaches and will notify Members in accordance with our contractual obligations if a breach occurs.

From the controller's perspective breaches are potentially more likely to occur because of human intervention. To mitigate this and aid detection there are some simple measures that can be put in place such as ensuring that Members have unique and secure logins.

3. How we Share Information

3.1 Our Platform

Any data that you include on your profile and any content you add to our Platform will be seen by other Members that you have chosen to share it with.

Profile

Your profile is fully visible to all Members, subject to your Settings.

Requests, Messages, Forum Posts

Your employer can see how you use Platform they provided for your work and related information. We will not show them your personal messages.

Our Platform allow viewing and sharing information including through requests, messages and forum posts.

- When you make a request for coaching and/or mentoring your employer, acting as an administrator will be able to view the content along with you Line Manager and the coach/mentor that you have requested the support from.
- When you message another Member only you and that other Member will see the content.
- When you make a post on the forum it can be viewed by all Members.

Enterprise Accounts

Your employer may offer you access to our Platform. Your employer can review and manage your use of such Platform.

Before you use our Platform, we will ask for permission (i.e. agreeing to this Privacy Policy) to share relevant data from your profile or use of our Platform. We understand that certain activities such as private notes and personal messages are sensitive, and so we do not share those with your employer unless you choose to share it with them either through our Platform or by other means (i.e. email).

3.2 Data Extraction

Your employer may need to extract data from our Platform.

Your employer may need, for legal or professional compliance, to extract data from our Platform. We enable data extraction from our Platform via CSV downloads. If an employer chooses to extract personal data from our Platform, then they are notified that they become both the Controller and Processor of that data and will need to comply to the relevant Data and Privacy regulatory requirements.

3.4 Others' Platform

You may add to your profile other Platform (i.e. Skype, LinkedIn, Twitter, Google+ and YouTube) so that other Members can look up your social profile/s or start conversations with you on these platforms.

We do not share any of your profile data with any of these other Platform. Please note that when using these platforms, you should inform yourself of their privacy policies and terms of use as they will be different to these.

3.4 Service Providers

We may use others to help us with our Platform.

We use others to help us provide our Platform (e.g., maintenance, analysis, audit, payments and fraud detection). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

3.5 Legal Disclosures

We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or (5) exercise or protect the rights and safety of LinkedIn, our Members, personnel, or others. We attempt to notify Members about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

3.6 Change in Control or Sale

We may share your data when our business is sold to others, but it must continue to be used in accordance with this Privacy Policy.

We can also share your personal data as part of a sale, merger or change in control, or in preparation for any of these events. Any other entity which buys us, or part of our business will have the right to continue to use your data, but only in the manner set out in this Privacy Policy unless you agree otherwise.

4. Your Choices & Obligations

4.1 Data Retention

We keep your personal data for as long as your account is open.

We retain your personal data while your account is in existence or as needed to provide you our Platform. This includes data you or others provided to us and data generated or inferred from your use of our Platform. Even if you only use our Platform infrequently, we will retain your information and keep your profile open until you decide to close your account. In some cases we choose to retain certain information in a depersonalized or aggregated form.

4.2 Rights to Access and Control Your Personal Data

You can access or delete your personal data. You have many choices about how your data is collected, used and shared.

We provide you with choices the collection, use and sharing of your data, from deleting or correcting data you include in your profile and controlling the visibility of your profile and communications. We offer you settings to control and manage the personal data we have about you.

For personal data that we have about you:

- **Delete Data:** You can ask us to erase or delete all or some of your personal data (e.g., if it is no longer necessary to provide Platform to you).
- **Change or Correct Data:** You can edit some of your personal data through your account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.
- **Object to, or Limit or Restrict, Use of Data:** You can ask us to stop using all or some of your personal data (e.g., if we have no legal right to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).
- **Right to Access and/or Take Your Data:** *You can ask us for a copy of your personal data and can ask for a copy of personal data you provided in machine readable form.*

You may also contact us, support@mye-coach.com and we will consider your request in accordance with applicable laws.

4.3 Account Closure

We may keep some of your data even after you close your account.

If you or your employer chooses to close your account, your personal data will generally stop being visible to others on our Platform immediately. We generally delete closed account information within 30 days of account closure, except as noted below.

We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfil your request to "unsubscribe" from further messages from us. We will retain de-personalised information after your account has been closed.

Information you have shared with others (e.g., requests, messages, forum posts) will remain visible after you close your account or delete the information from your own profile, and we do not control data that other Members extracted out of our Platform. Data associated with closed accounts will show as an unknown user as the source. Your profile may continue to be displayed in the Platform of others (e.g. search engine results) until they refresh their cache.

5. Other Important Information

5.1. Security

We monitor for and try to prevent security breaches.

We implement security safeguards designed to protect your data, such as HTTPS. We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

5.2. Storage of Data

We store your data in the European Union (EU).

5.3 Lawful Bases for Processing

We have lawful bases to collect, use and share data about you. You have choices about our use of your data.

At any time, you can withdraw consent you have provided by going to settings.

We will only collect and process personal data about you where we have lawful bases. Lawful bases include *consent* (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Platform you have requested)) and "legitimate interests".

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer.

5.5. Contact Information

You can contact us or use other options to resolve any complaints.

If you have questions or complaints regarding this Policy, we encourage you to contact us first – support@mye-coach.com.

If you feel you haven't received a timely or satisfactory response from us to your question or complaint you have the right to seek independent recourse from the relevant authority.