



Data Protection Policy

Policy Date: January 2025

Review Date: September 2025

Registration Number: 16072288

INTRODUCTION

At Elevate Performance Academy Ltd, we take your privacy seriously.

This notice describes how we collect and use your personal data in accordance with the General Data Protection Regulation (GDPR) and other applicable laws in the UK, as amended or updated from time to time.

Please read this notice carefully to understand our practices regarding your personal data and how we will treat it.

ABOUT US

Elevate Performance Academy Ltd is a company offering community engagement, coaching, and performance development services. We are registered in England and Wales under registration number [Insert Registration Number]. Our registered office is at [Insert Address]. For the purposes of data protection legislation and this notice, we are the "data controller."

WHAT INFORMATION WE COLLECT

The information we hold about you may include the following:

- Your personal details, e.g., your name and/or address
- Electronic contact details, e.g., your email address, Skype address, telephone number
- Details of any products or services you have received from us
- Communications and correspondence with you
- Information about enquiries or complaints you make to us
- Information from other publicly available sources, such as Companies House, LinkedIn, trade associations, etc.

HOW WE USE PERSONAL INFORMATION

We may process your personal data for purposes necessary for the normal conducting of our business activities, including:

- Account setup and administration
- Providing goods and services
- Delivering marketing communications
- Personalisation of content
- Internal audit requirements
- Reporting

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We may process your personal data for the purposes of our own legitimate interests, including processing for marketing, business development, and administration purposes. This processing is necessary and proportionate for our legitimate commercial interests and will not override any of your own interests, rights, and freedoms, which require the protection of personal data.

DATA SHARING

Your personal data will be treated confidentially and will not be shared with third parties, except where such sharing is necessary to fulfil our legitimate interests, provide the product or service you have requested, or where required by law.

WHERE WE STORE AND PROCESS PERSONAL DATA

The data we hold is stored and processed in the UK. However, it may sometimes be necessary to share your personal data outside the European Economic Area (EEA), for example:

- With service providers located outside the EEA
 - If you are based outside the EEA
- Such transfer of data would only be what was strictly necessary for the provision of the product or service you have requested from us.

DATA SECURITY

We have implemented appropriate security measures to prevent accidental loss, unauthorised access, or use of your personal data. Access to your personal data is limited to employees who need to know it to conduct our legitimate business interests. Employees are subject to a duty of confidentiality. In the event of a suspected data security breach, we will notify you and the applicable regulator as required by law.

RETENTION OF PERSONAL DATA

Your personal data will only be retained for as long as necessary to fulfil the purpose for which it was collected. The retention period will be determined by:

- The requirements of our legitimate business interests and related products/services
- Any statutory or legal obligations
- Whether the purpose of processing could reasonably be fulfilled by other means
- The type of personal data collected

YOUR RIGHTS IN RELATION TO PERSONAL DATA

You have the right to:

- Request access to your personal data
- Request correction or deletion of your personal data
- Object to processing based on legitimate interests
- Object to direct marketing
- Request restriction of processing
- Lodge a complaint with the Information Commissioner's Office

BREACH REPORTING PROCESS

- Data breach events are detected, reported, and monitored consistently
- Incidents are assessed and responded to appropriately
- Action is taken to reduce the impact of a breach
- Relevant breaches are reported within 72 hours
- Improvements are made to prevent recurrence
- Lessons learned are communicated to the wider organisation

DATA AUDIT PROCESS

- What data do we hold and why?
- How do we collect the data?
- How and where is the data stored?
- What do we do with the data?
- Who owns and controls the personal data?
- Retention and deletion
- Who is responsible for the data and processors associated with data?

DEFINITIONS OF KEY TERMS

- **Lawfulness, fairness, and transparency:** Data must be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data should only be collected for specified and legitimate purposes.
- **Data Minimisation:** Processing should be limited to necessary data.
- **Accuracy:** Controllers must ensure data is accurate and up-to-date.
- **Storage Limitation:** Data should not be kept longer than necessary.
- **Integrity and Confidentiality:** Data should be protected against unauthorised access or loss.
- **Accountability:** Controllers must demonstrate compliance with data protection principles.

LAWFUL PURPOSES

- Contract
- Legal Obligation
- Vital Interests
- Public Tasks
- Legitimate Interests
- Consent

PERSON RESPONSIBLE FOR DATA PROTECTION

- Chad Thorne – Co- Founder
- Louis Mifsud – Co-Founder

HOW TO CONTACT US

Should you wish to exercise any of the above rights or for any query related to this Data Protection Policy, please email us at: [Insert Email].

Alternatively, you can write to us at:

Data Protection

Elevate Performance Academy Ltd
106 Forfield Road, Coventry, CV6 1FS

COMPLAINTS TO ICO

If you wish to make a complaint to the Information Commissioner's Office (ICO), their contact details are:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Website: <https://ico.org.uk>

This Data Protection Policy ensures that Elevate Performance Academy Ltd remains fully compliant with GDPR and applicable UK data protection laws.

