

PRIVACY POLICY

This privacy policy was last updated on the 19th September 2019.

Who we are and what this privacy policy covers

This privacy policy explains how and why BeLiminal LLP (“**we**”, “**us**” or “**BeLiminal**”) may collect and process personal data about you (including through your use of this website or when you purchase a product or service from us) and the rights you have in relation to your personal data.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and is not intended to override them.

This privacy policy is provided in a layered format so you can click through the specific areas set out below. Alternatively, you can download a pdf version [here](#).

Our commitment to you

We respect your privacy and are committed to protecting your personal data. Furthermore, we fully endorse and will adhere to the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”) and all UK data protection legislation including the Data Protection Act 2018.

In particular we will comply with our legal obligations to keep personal data up to date, to store and destroy it securely, to not collect or retain excessive amounts of data, to use reasonable measures to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

How you acknowledge this privacy policy

By using any of our services (including our website) and by providing us with any personal data, you acknowledge that you understand that the use of the personal data will be in accordance with this policy.

Please do not send us any information if you do not want it to be used in this way.

Please note that if you do not provide certain requested information we may be unable to provide certain of our services to you and you may be unable to access certain content via our website.

Personal data which you provide on behalf of someone else

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can (i) give consent on his/her behalf to the processing of his/her personal data and (ii) receive on his/her behalf any data protection notices.

The personal data we collect about you

Personal data means any information about a living individual which allows them to be identified from that data including, for example, a first and last name, email address or address (whether at work or at home). Identification can be by the information alone or in conjunction with any other information. It does not include data where the identity has been removed (anonymous data).

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.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your

personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

How we obtain information about you

1. Information which you provide us

You may provide us with personal data when you visit our website, book onto one of our workshops/training courses, do business with us, fill in one of our forms on our website, email or phone us, or meet us in person.

Sensitive personal data* may be collected by us from you when you choose to attend one of our workshops/training courses (or other events organised by us or on our behalf). For example, you may choose to submit personal health data relating to special needs or dietary requirements you may have to enable us to meet your requirements or deal with your requests. We will only collect sensitive personal data with your explicit consent and, if we request such information, we will explain why we are requesting it and how we intend to use it.

* GDPR refers to **sensitive personal data** as 'special categories of personal data' (Article 9, GDPR) and includes data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

2. Information we collect about you

We collect information about you when you engage with us online or by email e.g. when you visit our website, open or forward an email sent by us, engage with us on social media networks or when you are served one of our tailored adverts. Information may be collected via cookies and similar technologies, as detailed below.

3. Information we receive from other sources

We may also collect information about you from reputable third parties that operate in accordance with UK data protection legislation or other public sources, if this is permitted by law, such as:

- social media sites;
- advertising networks;
- analytics providers (such as Google);
- event providers;
- booking service providers;
- training partners;
- business partners; and
- identity and credit reference agencies.

Use of cookies and similar technologies

We use cookies and similar technologies such as pixel tags and web beacons on our website and in our some of our emails.

What is a cookie?

A cookie is a small file of letters and numbers which is sent to and stored on your computer (or other electronic device) to identify you whenever you visit a website.

There are many types of cookies but broadly they can be grouped by purpose:

- strictly necessary cookies – i.e. those cookies that are required for the operation of our website and include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services;
- analytical or performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it (this helps us to improve the way our website works, for example, by ensuring the users are finding what they are looking for easily);
- functionality cookies – these are used to recognise you when you return to our website (this enables us to personalise our content for you, greet you by name and remember your preferences when you return to a website e.g. your choice of language or region);
- targeting cookies – these cookies record your visit to our website, the pages you have visited and the links you have followed (this enables us to make our website and the advertising displayed on it more relevant to your interests and we may also share this information with third parties such as Google for this purpose).

Cookies can also be grouped according to whether they are ‘first-party’ cookies or ‘third-party’ cookies. The difference is that first-party cookies are placed and controlled by the website you are visiting whereas third-party cookies are placed and controlled by a third-party.

What are pixel tags and web beacons?

Pixel tags and web beacons are tiny graphic images embedded in a web page or in emails to achieve similar purposes as those described above.

How and why we use cookies and similar technologies

We use strictly necessary and analytical/performance cookies as described [above](#). In addition, we use the following [cookies and similar technologies](#):

- **Zoho cookies** to securely collect information via forms on our website.
- **Facebook, LinkedIn and Zoho cookies** to determine whether you have performed a specific action when you engage with us via an advertising or email campaign, or visit our website, so that we can select and carefully tailor the products and services that we market to you and improve our web pages, promotions and our communications with you.

- **Google analytics cookies** for statistical purposes to collect data about website usage (for example page views and time spent on our website). This data does not include personally identifiable information.
- **Google advertising cookies**, including the following features:
 - **Google Display Network Impression Reporting** – to give us insight into who has viewed our paid digital advertising on third-party websites (this enables us to optimise and tailor our advertising);
 - **DoubleClick Platform Integrations & Remarketing with Google Analytics** – the integrations between our web analytics and paid advertising platforms give us additional insight and allows us to tailor our advertising to ensure the right types of advertising are shown to you while you are using the internet outside our website;
 - **Google Analytics Demographics and Interest Reporting** – to give us insight into behaviour information relating to visitor age, gender and interests on an anonymous and aggregate level (this enables us to understand browsing behaviour to give you a better experience when visiting our website).

To learn [how to manage cookies and control your privacy](#) and how to [opt out of receiving email notifications or marketing materials](#) from us please read the relevant sections below. For a detailed cookie report, please [contact us](#).

[How to manage cookies and control your privacy](#)

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org and www.youronlinechoices.eu. For a video about cookies visit www.google.co.uk/policies/technologies/cookies.

The exact procedure to prevent new cookies from being installed and how to delete existing cookies depends on which browser you are using but the following links may be helpful:

- Internet Explorer
<http://windows.microsoft.com/en-GB/internet-explorer/delete-manage-cookies>
- Safari
<http://help.apple.com/safari/mac/8.0/#/sfri11471>
- Google Chrome
<https://support.google.com/chrome/answer/95647?hl=en>
- Firefox
see <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
and
<https://support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored>

If you do not want your website visits to be recorded by Google Analytics you can opt-out with the addition of the [Google Analytics Opt-out Browser Add-on](#) which is available for

Microsoft Internet Explorer 11, Google Chrome, Mozilla Firefox, Apple Safari and Opera. You can also set preferences for how Google advertises to you using the [Google Ads Settings page](#) and you can opt-out of Google Analytics Advertising Features [here](#).

You can choose to disable cookies in your internet browser but please note that if you delete cookies or decline to accept them you may not be able to use all of the features we offer, or store your preferences; in addition, some of our web pages might not display properly. If you want to turn off the more invasive cookies but leave most other functionality in working order, then a good option is to turn off third-party cookies using your browser settings.

In addition, we recommend that you check your privacy settings on any site which requires you to register or login, and that you never save your passwords in your browser or on your device, other than in a reputable password management system.

The legal basis for processing personal data and the purposes for which we will use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform a contract we are about to enter into or have entered into with 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; or
- where we need to comply with a legal obligation

Generally we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

We may use your information for some or all the following purposes:

- to register you as a new customer;
- to enable you to register or book onto one of our workshops and/or training courses;
- to process and deliver your order (including managing payments, fees and charges and collecting and recovering money owed to us);
- to manage our relationship with you (including where we ask you to leave a review);
- to administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to undertake post-event evaluations of our workshops and/or training courses;
- to respond to your requests in relation to events (e.g. workshops and training courses), presentations, information and services;

- so that we can tell you about other events (e.g. workshops and conferences), presentations, products or services that may be of interest to you;
- to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- to enable you to partake in a prize draw, competition or complete a survey;
- to notify you of changes to our services and/or events;
- to enable you to register on our website to access presentations and other information;
- to seek your views or comments;
- to enable your registration with the Scrum Alliance (or any other professional membership/certification organisation in the Agile community including, but not limited to, Scaled Agile Academy and Lean Kanban University) following your attendance on one of our courses which has been certified by that organisation and allowing you to take any necessary exams;
- where it is necessary for the preparation or performance of a contract with you;
- where it is necessary in connection with a professional or legal obligation;
- to personalise and improve our services to you;
- (if you have a business or professional relationship with us) to develop our business relationship with you;
- to remember your preferences e.g. if you ask not to receive marketing material we will keep a record of this;
- if you apply for a job to consider you for employment;
- to conduct research, statistical analysis and behavioural analysis;
- to use data analytics to improve our website, products/services, marketing, customer relationships and experiences;
- to compile anonymous statistics, for example, website usage statistics;
- to customise our website and its content to your particular preferences;
- to notify you of any changes to our website or to our services that may affect you;
- to detect and prevent fraud;
- for other everyday business purposes, such as internal record keeping, payment processing and financial account management, contract management, website administration, analytics, corporate governance, reporting and legal compliance;
- where we otherwise consider such use of your information as not detrimental to you, within your reasonable expectations and necessary to fulfil our legitimate business interests.

We will only use your information for the purpose it was collected (or for similar/related purposes). 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.

Who your personal data may be shared with

We recognise that your information is valuable and will take all reasonable measures to protect your information while it is in our care (see how [below](#)).

Your personal data may be transferred to:

- the partners of BeLiminal to enable them to carry out their responsibilities as a partner of BeLiminal;
- third party associate/consultant companies or individuals for the purpose of facilitating workshops and/or provide coaching and/or training services on our behalf;
- the Scrum Alliance, Inc. (“Scrum Alliance”) (or any other professional membership/certification organisation in the Agile community including, but not limited to, Scaled Agile Academy and Lean Kanban University) to allow registration with that organisation following attendance by you on one of our courses which has been certified by them and allowing you to take any necessary exams
- third party service providers (such as Zoho, Microsoft and Google) who store/process information on our behalf, including providers of information technology, identity management, website hosting and management, data analysis, data back-up, security and storage services;
- Eventbrite or other third party booking service providers or payment gateway providers to process your booking or payment for one of our training courses or workshops;
- mailing or printing agents, contractors and advisers that provide a service to us or act as our agents;
- insurance companies, law enforcement, regulatory, or other government agencies for the purposes of fraud prevention and/or to comply with any legal and regulatory issues and disclosures; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets and if a change happens to our business then the new owners may use your personal data in the same way as set out in this privacy policy.

We may also share certain pieces of aggregated, non-personal data about you with third parties. For example, we may provide a third party with information such as the number of users who searched for a particular term or how many users clicked on a particular advertisement. This information does not identify you individually.

We do not sell, rent, distribute or otherwise make personal data commercially available to any third party except as described in this policy or with your prior permission.

Security and protection of your personal data

We use reasonable technical, administrative and physical controls to safeguard your personal data from unlawful use and unauthorised disclosure. For example, we store your personal data on secure servers. In all cases we will ensure that any access or transfer of your personal data is compliant with UK data protection law.

Where we use third parties ([see above](#)) to provide elements of our service and/or to process data on our behalf they are bound by law or contract to protect your personal data and only use it in accordance with our instructions. We only allow third parties to handle your personal data on the understanding that they will keep the information confidential.

We normally only store your personal data within the European Economic Area (“**EEA**”). If one of our service providers (e.g. a payment gateway provider or payment processor such as

Eventbrite or an online server/storage provider such as Google) needs to transfer your personal data outside of the EEA then we will either ensure a data protection level equal to the one in the EEA or we will obtain your consent to the transfer. For example, if you book onto one of our training courses through Eventbrite or if we store your personal data on Google Drive or Office 365's secure servers they may transfer your personal data outside of the EEA as they are US organisations – these third party organisations do however participate in and comply with the EU-US Privacy Shield Framework and accordingly the European Union allows the transfer.

Please note that if you book on to one of our certified training courses you may be required to give your consent to pass your personal data to the relevant professional membership/certification organisation to facilitate any registration/membership with them or to allow you to take any necessary exams. This is because the organisation may be a non-EEA organisation which does not participate in the EU-US Privacy Shield Framework. For example, Scrum Alliance is based in the United States and does not participate in the EU-US Privacy Shield Framework and all delegates who wish to be considered for Scrum certification and membership will be required to consent to the transfer, storage and processing of their name, address and email address to the United States in accordance with Scrum Alliance's privacy policy (which can be found at www.scrumalliance.org/privacy-policy).

All the BeLiminal partners, employees and associates/consultants who have access to personal and/or confidential information are subject to confidentiality and data protection obligations.

While we will use all reasonable efforts to safeguard your personal data you acknowledge that the use of the internet is not entirely secure and understand that we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. If you want detailed information on how to protect your information and your computers and devices against fraud, identity theft, viruses and other online problems you can visit [Get Safe Online](#), which is supported by HM Government and leading businesses.

Data retention

We will retain your personal data for the period necessary to fulfil the purposes outlined in this privacy policy unless a longer retention period is required or permitted in relation to any legal, statutory or regulatory obligations.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Links to third-party sites

This privacy policy only addresses the use and disclosure of personal data by us. Our website may include links to third-party websites, plug-ins and applications which may be of interest to you. In addition, we may provide social sharing and follow buttons on our website. If you use or follow these links or buttons to any of these third party sites, please be aware that they have their own cookies and privacy policies which we recommend you read. We do not control these other sites and we cannot be responsible for the content of these sites or for protection of any information you provide to other sites. You should be cautious when entering personal data online.

Your rights

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights.

You have a number of legal rights under applicable data protection legislation in relation to the personal data that we hold about you, including:

- The right to **access** (a copy of) particular personal data that we hold about you and certain supplementary information (e.g. the sources from which we acquired the information, the purposes for processing the information and the persons/entities with whom we are sharing the information). We may (i) refuse to provide details and/or (ii) charge a small fee, if relevant legislation allows us to do so, in which case we will provide reasons for our decision as required by law.
- The right to ask that we **erase your information** in certain circumstances. Please note that there may be circumstances where you ask us to erase your information but we are legally entitled to retain it.
- The right to **withdraw your consent** to the use of your information where we are relying on that 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. (for Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for doing so.
- In some circumstances, you have the right to receive some of your information in a usable format and/or request we transmit that data to a third party where this is technically feasible. Please note that this **right of transfer** only applies to information which you have provided to us.
- The right to ask that we **update** your personal data free of charge, if it is inaccurate or incomplete.
- The right to request that we **restrict** the processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request.
- The right to **make a complaint** with the [Information Commissioner](#) if, after raising your concern with us and [making a privacy complaint](#), you think that any of your rights have been infringed by us.

You can exercise your rights by [contacting us](#). Please note that we usually act on requests and provide information free of charge. We may however be entitled to refuse to act on a request and we may charge a reasonable fee in relation to our administrative costs if the request is baseless, excessive or repeated.

We will respond to you as soon as we can. This will generally be within one month from the date we receive your request but if your request is going to take longer to deal with we will let you know.

How to opt out of receiving marketing materials

You have the right to opt out from receiving marketing materials from us. You can do this by [contacting us](#) or by clicking on the relevant link in the email itself. You may choose to opt out of one or all lists.

Making a privacy complaint

If you want to submit a written complaint about how we handle your personal data, please [contact us](#) or email us at privacy@beliminal.com

If you make a privacy complaint, we will respond to let you know how your complaint will be handled. We may ask you for further details, consult with other parties and keep records regarding your complaint.

Contact and further information

If you have any questions or concerns about this privacy policy or the information we hold about you please [contact us](#) or email us at privacy@beliminal.com

Changes to our privacy policy and your duty to inform us of changes

This privacy policy is subject to change from time to time without notice. Changes may be made when our business practices change or when data privacy laws are updated. You should therefore check this policy regularly to ensure that you are aware of any changes. This version was last updated on the 19th September 2019 and historic versions can be obtained by contacting us.

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