



## Privacy Notice

At The Inclusion Initiative Ltd (Tii) we're committed to protecting and respecting your privacy.

This privacy notice explains when and why we collect personal information about people who visit our website and interact with Tii via telephone, email and any other forms of correspondence. It covers how we use this information, the conditions under which we may disclose it to others and how we keep it secure.

We may change this notice from time to time so please check this page occasionally to ensure that you're happy with any changes. By using this website and corresponding with Tii, you're agreeing to be bound by this notice.

Any questions regarding this notice and our privacy practices should be sent by email to [info@theinclusioninitiative.co.uk](mailto:info@theinclusioninitiative.co.uk)

### Who we are

We are Tii, a small training company that offers expert guidance and training to support mental health and diversity and inclusion. Our vision is a world where all organisations have trained mental health first aiders. Where people are able to talk about their mental health freely and be met with support not judgement. That organisations and employees are equipped to support employees living with a mental health condition.

Tii is a registered limited company (no. 11429774). Our registered address is 42 The Causeway, Carshalton, SM5 2NB

### How do we collect information from you?

We obtain information about you when you use our website, email or correspondence with Tii, for example when you contact us about products and services.

### What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. If you purchase a product from us, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions.

Below is an in-depth summary of the different categories of data we may use.

– **Communication data** that includes any communication that you send us whether that be through the contact form on our website, through email, text, social media messaging, social media posting, or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.



– **Customer data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

– **User data** that includes data about how you use our website and any online services together. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and/or databases, and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

– **Technical data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings, and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our

business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

– **Marketing data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products and services, to develop them, to grow our business and to decide our marketing strategy.

We may use customer data, user data, technical data, and marketing data to deliver relevant website content and advertisements to you (including social media adverts and other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is our legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

– **Sensitive data** refers to data that includes details about your physical or mental health, race or ethnicity, religious or philosophical beliefs, sexual orientation, trade union membership, and armed forced background. We require your explicit consent for processing sensitive data, so when you submit your details you will be asked to provide your consent for this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract. If you do not provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. If we need to use your details for an unrelated new purpose we will let you know and explain the legal ground for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### **How is your information used?**

We may use your information to:

- Process orders that you have submitted
- Carry out our obligations arising from any contracts entered into by you and us
- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Send you communications which you have requested and that may be of interest to you. These may include information about information about campaigns, events, other activities and promotions of our goods and services
- Process a job application

### **Who has access to your information?**

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

### **Third party service providers working on our behalf**

We may pass your information to our third party providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and send you mailings).

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganization, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## **How you can access and update your information: your legal rights**

Under data protection laws you have rights in relation to your personal data. These rights include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data, and where the lawful ground of processing is consent, to withdraw consent.

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or if any other information we hold is inaccurate or out of date, or you wish to exercise any of the rights set out above, please email us at [info@theinclusioninitiative.co.uk](mailto:info@theinclusioninitiative.co.uk).

You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case we will notify you.

## **Profiling**

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect fraud and credit risk.

## **Use of cookies**

Like many other websites, the Tii website uses cookies. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. It is possible to switch off cookies by setting your browser preferences. You can find more about Cookies [here](#)

By law, we need your permission to store cookies on your computer or device. Like many organisations we need to take time to make sure the website complies with the law, and we're working very hard to make sure we can record permission from our visitors.

Until we can do that, if your internet browser's settings accept cookies on your computer or mobile device, we assume you're happy for us to use them. On this page we'll tell you how to delete or refuse cookies, in case you're not happy for us to store them – but please keep in mind that the site might not work the way you'd expect if we can't use them.

### **Links to other websites**

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

Similarly, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

### **Transferring your information outside of Europe**

Wix is a GDPR compliant organisation. Wix uses cryptography hash functions to protect your information. Wix.com is certified under the EU-US Privacy Shield Framework and the Swiss-US privacy Shield Framework as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, and therefore adheres to the Privacy Shield Principles.

### **Data security**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential. We have procedures in place to deal with any suspected data breach and will notify you and any applicable regulator of a breach if we are legally required to do so. Any sensitive information (such as credit or debit card details) is encrypted and protected.

Non-sensitive details (e.g. your email address) are transmitted normally over the internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### **Data retention**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

When deciding what the correct time is to keep data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means, and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.



**Review of this notice**

We keep this notice under regular review. This notice was last updated in June 2020.