

Privacy Policy

Last updated: [19.08.2025]

Important: Your Location Matters

This privacy policy applies to all users, but your rights and our obligations vary by location. Please see the relevant sections:

- **UK/EU Users:** Sections 1-15 + Section 16 (GDPR Rights)
- **US Users:** Sections 1-15 + Section 17 (US State Privacy Rights)
- **Other Locations:** Sections 1-15 apply, with local laws taking precedence where applicable

1. Who We Are

Data Controller: Nat King - I-Vine Training Ltd

Company Registration: 14737992 (England and Wales)

Address: 1 Castlehill, Chiltern Heights, High Wycombe, England, UK

Email: info@i-vinetraining.com

Phone: +44 7862 191291

US Privacy Contact: info@i-vinetraining.com (marked "US Privacy Request")

We are I-Vine Training Ltd, a UK-based professional development company. We help organisations and professionals build sustained adaptability and leadership capabilities using our proprietary Adaptability Advantage System (AAS) framework.

For privacy questions or to exercise your rights, contact us using the details above.

2. What Personal Data We Collect

2.1 Information You Provide Directly

Discovery Calls and Enquiries

- **Data:** Name, email, phone number, company details, job title, industry
- **Sensitive Data:** Specific business challenges, goals, and professional situations you share
- **Purpose:** Understanding your needs and providing relevant service information
- **Legal Basis:** Legitimate interests (enquiry response) and consent

Adaptability Quotient (AQ) Assessment

- **Data:** Assessment responses, capability scores, development metrics, progress indicators
- **Analysis:** Baseline measurements, development pathways, capability gaps

- **Purpose:** Creating personalized development plans and tracking progress
- **Legal Basis:** Contract performance and legitimate interests
- **Retention:** 7 years for professional development records

Service Delivery (Coaching, Workshops, Consulting)

- **Data:** Session notes, progress tracking, development milestones, feedback, action plans
- **Recordings:** Session recordings (only with explicit consent)
- **Materials:** Custom assessments, development plans, progress reports
- **Purpose:** Delivering effective services and measuring outcomes
- **Legal Basis:** Contract performance

Newsletter and Marketing

- **Data:** Email address, communication preferences, engagement metrics
- **Purpose:** Sending relevant updates and thought leadership content
- **Legal Basis:** Consent (you can unsubscribe anytime)

2.2 Information We Collect Automatically

Website Usage

- **Data:** IP address, browser type, device information, pages visited, time spent, referring sites
- **Cookies:** Essential, analytics, and preference cookies (with consent)
- **Purpose:** Website functionality and user experience improvement
- **Legal Basis:** Legitimate interests and consent for non-essential cookies

Service Analytics

- **Data:** Service usage patterns, completion rates, outcome metrics
- **Purpose:** Service improvement and outcome measurement
- **Legal Basis:** Legitimate interests

2.3 Children's Information

Age Restrictions: Our services are not directed to individuals under 18 years old. We do not knowingly collect personal information from children under 13 (or 16 in the EU). If we discover we've collected such information, we will delete it promptly.

Parental Rights: Parents may request review and deletion of their child's information by contacting us.

3. How We Use Your Personal Data

3.1 Primary Uses

- **Service Delivery:** Providing coaching, assessments, workshops, and consulting

- **Assessment Processing:** Analysing AQ assessments and creating development plans
- **Progress Tracking:** Monitoring development outcomes and capability growth
- **Communication:** Responding to enquiries and service-related communications
- **Improvement:** Enhancing our services and methodologies

3.2 Secondary Uses

- **Marketing:** Sending relevant content and service updates (with consent)
- **Research:** Anonymous analysis for service development (aggregated data only)
- **Case Studies:** Creating anonymized success stories (with explicit consent)
- **Professional Development:** Internal team training and capability building

3.3 Legal and Compliance Uses

- **Legal Obligations:** Complying with applicable laws and regulations
- **Business Protection:** Protecting our rights and investigating potential violations
- **Professional Standards:** Maintaining coaching and training professional standards

4. Legal Basis for Processing

UK/EU Legal Bases:

- **Contract:** Delivering services you've engaged us for
- **Consent:** Marketing communications and non-essential cookies
- **Legitimate Interests:** Enquiry responses, service improvement, business communications
- **Legal Obligation:** Compliance with applicable laws

US Legal Bases:

- **Business Purpose:** Providing requested services and business operations
- **Commercial Purpose:** Marketing and advertising (with consent where required)
- **Legal Compliance:** Meeting legal and regulatory requirements

5. Data Sharing and Disclosure

5.1 Service Providers

We share data with carefully selected third parties who help deliver our services:

- **Assessment Platforms:** For AQ assessment delivery and analysis
- **Communication Tools:** Email marketing, scheduling, and video conferencing
- **Cloud Services:** Secure data storage and backup services
- **Payment Processors:** Secure payment processing
- **Analytics Providers:** Website and service usage analysis

5.2 Professional Advisors

- **Legal Counsel:** For legal advice and compliance
- **Accountants:** For financial and tax requirements
- **Insurance Providers:** For professional liability coverage
- **Business Consultants:** For operational improvements

5.3 Legal Requirements

We may disclose information when required by law or to:

- **Regulatory Authorities:** Government agencies and regulators
- **Law Enforcement:** In response to valid legal requests
- **Legal Proceedings:** As required in litigation or investigations
- **Safety:** To protect individuals or public safety

5.4 Business Transfers

In case of merger, acquisition, or business sale, personal data may be transferred as part of business assets, subject to equivalent privacy protections.

No Sale of Personal Data: We never sell personal data to third parties for commercial purposes.

6. International Data Transfers

6.1 Where We Store Data

- **Primary Storage:** UK and EU cloud servers
- **Backup Systems:** May include US-based secure cloud storage
- **Service Providers:** Some providers may process data in other jurisdictions

6.2 Transfer Safeguards

For EU/UK Data:

- **Adequacy Decisions:** Transfers to countries with adequate protection
- **Standard Contractual Clauses (SCCs):** EU-approved transfer mechanisms
- **Binding Corporate Rules:** For multinational service providers

For US Data:

- **Domestic Processing:** Preference for US-based processing where possible
- **International Safeguards:** Equivalent protections for any international transfers

6.3 Your Rights Regarding Transfers

You can request information about where your data is processed and object to certain transfers.

7. Data Retention

7.1 Retention Periods

- **Enquiry Data:** 2 years from last contact
- **Client Service Data:** 7 years after service completion (professional development records)
- **Assessment Results:** 7 years (long-term development tracking)
- **Marketing Data:** Until you unsubscribe or withdraw consent
- **Website Analytics:** 26 months
- **Financial Records:** 7 years (UK legal requirement)
- **Session Recordings:** Maximum 3 years (with explicit consent)

7.2 Extended Retention

We may retain data longer when:

- Required by law or regulation
- Needed for legal proceedings
- Necessary for legitimate business interests (with appropriate safeguards)

7.3 Secure Deletion

When retention periods expire, we securely delete or anonymize personal data using industry-standard methods.

8. Security Measures

8.1 Technical Safeguards

- **Encryption:** Data encrypted in transit (TLS 1.3) and at rest (AES-256)
- **Access Controls:** Multi-factor authentication and role-based access
- **Network Security:** Firewalls, intrusion detection, and monitoring
- **Regular Updates:** Security patches and software updates
- **Backup Security:** Encrypted, geographically distributed backups

8.2 Organizational Measures

- **Staff Training:** Regular privacy and security training
- **Background Checks:** Security screening for personnel with data access
- **Incident Response:** Documented breach response procedures
- **Privacy by Design:** Privacy considerations in all new systems
- **Regular Audits:** Security assessments and penetration testing

8.3 Data Breach Procedures

Immediate Response:

- Contain and assess the breach within 72 hours
- Notify relevant supervisory authorities as required
- Inform affected individuals when risk of harm is likely

Ongoing Response:

- Investigate root causes and implement corrections
- Document incidents and lessons learned
- Update security measures as needed

9. Cookies and Tracking

9.1 Cookie Types

Essential Cookies (No consent required)

- Website functionality and security
- Session management and preferences

Analytics Cookies (Consent required)

- Google Analytics for website usage understanding
- Performance monitoring and optimization

Marketing Cookies (Consent required)

- Targeted advertising and campaign tracking
- Social media integration

9.2 Cookie Management

- **Browser Controls:** Manage preferences through browser settings
- **Consent Management:** Update preferences through our cookie banner
- **Third-Party Cookies:** Controlled by respective privacy policies

9.3 Do Not Track

We honor Do Not Track browser settings where technically feasible.

10. Third-Party Services and Links

10.1 Integrated Services

Our website integrates with:

- **Google Analytics:** Website usage analysis
- **Email Marketing Platforms:** Newsletter and communication management
- **Video Conferencing:** Remote service delivery

- **Scheduling Tools:** Appointment booking and calendar management

10.2 External Links

Our website contains links to third-party sites. This privacy policy applies only to our services. We recommend reviewing third-party privacy policies before providing personal information.

10.3 Social Media

Social media plugins may track your visits across sites. Refer to respective platform privacy policies for details.

11. Marketing Communications

11.1 Email Marketing (CAN-SPAM Compliance)

- **Clear Identification:** All emails clearly identify I-Vine Training Ltd
- **Physical Address:** Our business address included in all marketing emails
- **Easy Unsubscribe:** One-click unsubscribe in all marketing communications
- **Prompt Processing:** Unsubscribe requests processed within 10 business days
- **No False Headers:** Accurate "From" and "Reply-To" information

11.2 Communication Types

Transactional Emails:

- Service confirmations and receipts
- Appointment reminders and changes
- Assessment results and development materials
- Legal and policy updates

Marketing Emails:

- Newsletter and thought leadership content
- Service updates and new offerings
- Event invitations and educational content

11.3 Consent Management

- **Opt-In Required:** Explicit consent for marketing communications
- **Granular Controls:** Choose specific communication types
- **Easy Withdrawal:** Unsubscribe anytime without affecting service communications

12. Professional Services Specific Provisions

12.1 Coaching and Development Data

- **Professional Privilege:** No legal privilege, but professional confidentiality maintained
- **Progress Tracking:** Development metrics used for service improvement
- **Employer Sharing:** No sharing with employers without explicit written consent
- **Peer Learning:** Anonymous insights may be shared in group settings (with consent)

12.2 Assessment Data

- **Methodology Protection:** Our assessment methods remain proprietary
- **Result Ownership:** Your assessment results belong to you
- **Benchmark Data:** Anonymous aggregated data used for assessment improvement
- **Research Use:** Anonymized data may be used for professional development research

12.3 Business Client Considerations

- **Multiple Contacts:** May collect data from various individuals within client organizations
- **Decision Makers:** May share appropriate information with designated client representatives
- **Outcome Reporting:** May provide progress reports to authorized client personnel

13. Changes to This Policy

13.1 Update Procedures

- **Regular Reviews:** Policy reviewed annually and when services change
- **Notification Methods:** Website posting and email notification for material changes
- **Effective Date:** Updated "Last modified" date indicates most recent version

13.2 Material Changes

For significant changes affecting your rights or our data use:

- **Email Notification:** Direct notification to registered users
- **Prominent Notice:** Website banner or notification
- **Choice Provision:** Opportunity to object or withdraw consent where applicable

13.3 Continued Use

Continued use of our services after changes constitutes acceptance of updated terms.

14. Contact Information and Complaints

14.1 Privacy Contacts

General Privacy Questions:

- **Email:** info@i-vinettraining.com

- **Phone:** +44 7862 191291
- **Address:** 1 Castlehill, Chiltern Heights, High Wycombe, England, UK

US Privacy Requests:

- **Email:** info@i-vinetraining.com (marked "US Privacy Request")

14.2 Response Times

- **Acknowledgment:** Within 5 business days
- **Full Response:** Within 30 days (UK/EU) or as required by applicable law

14.3 Complaint Procedures

Internal Process:

1. Contact us directly with your concern
2. We'll investigate and respond within required timeframes
3. Escalation to senior management if needed

External Remedies:

- **UK/EU:** Information Commissioner's Office (ICO)
- **US:** Relevant state attorney general or consumer protection agency

15. Accessibility and Language

15.1 Accessibility

- **Alternative Formats:** Large print or audio versions available upon request
- **Language Support:** Translation assistance available for major languages
- **Accommodation:** Reasonable accommodations for individuals with disabilities

15.2 Plain Language

We strive to use clear, understandable language. Contact us if any section needs clarification.

16. Additional Rights for UK/EU Users (GDPR)

16.1 Your GDPR Rights

Right of Access

- Request copies of your personal data
- Information about how we use your data
- Details about data sharing and retention

Right to Rectification

- Correct inaccurate or incomplete data
- Update outdated information
- Amend assessment results if errors identified

Right to Erasure ("Right to be Forgotten")

- Request deletion of your personal data
- Subject to legal retention requirements
- May affect our ability to provide ongoing services

Right to Restrict Processing

- Limit how we use your data
- Temporarily halt processing while disputes are resolved
- Object to specific uses while maintaining service relationship

Right to Data Portability

- Receive your data in machine-readable format
- Transfer data to another service provider
- Applies to data processed by automated means

Right to Object

- Object to processing based on legitimate interests
- Stop direct marketing at any time
- Object to automated decision-making

Right to Withdraw Consent

- Remove consent for specific processing activities
- Does not affect past processing or other legal bases
- May impact service delivery

16.2 Exercising Your Rights

How to Request:

- Email: info@i-vinetraining.com with "GDPR Request" in subject
- Phone: +44 7862 191291
- Post: Include request details and identity verification

Identity Verification:

- Photo ID and proof of address may be required
- Additional verification for sensitive requests
- Authorized agents must provide written authorization

Response Timeframes:

- **Standard Response:** Within 1 month of verified request
- **Complex Requests:** May extend to 3 months with explanation
- **Free of Charge:** Unless requests are excessive or repetitive

16.3 Supervisory Authority

Information Commissioner's Office (ICO)

- **Website:** ico.org.uk
 - **Phone:** 0303 123 1113
 - **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
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17. Additional Rights for US Users

17.1 California Consumer Privacy Act (CCPA/CPRA) Rights

Applicability: If you are a California resident, you have additional rights under the California Consumer Privacy Act.

Right to Know

- Categories of personal information collected
- Sources of personal information
- Business or commercial purposes for collection
- Categories of third parties with whom we share information
- Specific pieces of personal information collected about you

Right to Delete

- Request deletion of personal information we collected from you
- Subject to certain exceptions for legal compliance and business operations
- We'll notify service providers to delete your information

Right to Correct

- Request correction of inaccurate personal information
- We'll use commercially reasonable efforts to correct information

Right to Opt-Out of Sale/Sharing

- We don't sell personal information, but you can opt-out if practices change
- Right to opt-out of sharing for targeted advertising
- We honor Global Privacy Control signals

Right to Limit Sensitive Personal Information

- Request limits on use of sensitive personal information
- Applies to information beyond what's necessary for service provision

Right to Non-Discrimination

- We won't discriminate against you for exercising your privacy rights
- We won't deny services, charge different prices, or provide different service levels

17.2 Virginia, Colorado, Connecticut, and Utah Privacy Rights

Similar Rights Include:

- Access to personal data
- Correction of inaccurate data
- Deletion of personal data
- Opt-out of targeted advertising
- Opt-out of profiling for certain decisions

State-Specific Variations:

- **Virginia (VCDPA):** Additional controller obligations and appeal rights
- **Colorado (CPA):** Opt-out of profiling and appeal process
- **Connecticut (CTDPA):** Similar to Virginia with specific business thresholds
- **Utah (UCPA):** More limited scope but similar core rights

17.3 Exercising US Privacy Rights

How to Submit Requests:

- **Online:** [To be added - privacy request form]
- **Email:** info@i-vinettraining.com (marked "US Privacy Request")
- **Phone:** +44 7862 191291 (mention US privacy request)

Verification Process:

- **Identity Verification:** We'll verify your identity before processing requests
- **Authorized Agents:** Must provide written authorization and proof of identity
- **Business Contact:** May require additional verification for business accounts

Response Timeframes:

- **California:** 45 days (may extend 45 additional days)
- **Other States:** As required by applicable state law
- **Acknowledgment:** Within 10 business days of receipt

17.4 US-Specific Data Practices

Data Sales: We do not sell personal information to third parties.

Targeted Advertising: We may use cookies for targeted advertising (with consent).

Profiling: We don't make automated decisions that significantly affect you.

Sensitive Information: We limit collection and use of sensitive personal information to what's necessary for services.

17.5 Children's Privacy (COPPA Compliance)

Under 13: We don't knowingly collect information from children under 13.

Discovery and Deletion: If we learn we've collected such information, we'll delete it promptly.

Parental Rights: Parents can request review and deletion of their child's information.

School Services: If providing services through educational institutions, we comply with FERPA and similar regulations.

17.6 State Enforcement Contacts

California: California Attorney General's Office - Privacy Section

Virginia: Virginia Attorney General - Consumer Protection Section

Colorado: Colorado Attorney General - Consumer Protection Section

Connecticut: Connecticut Attorney General - Privacy and Data Security

Utah: Utah Attorney General - Consumer Protection Division

18. Summary of Key Points

What We Collect: Contact information, assessment responses, service delivery data, website usage

Why We Collect It: To provide professional development services, assessments, and communications

Who We Share With: Service providers, professional advisors, and as required by law (never sold)

Where It's Stored: Primarily UK/EU with some US cloud services (with appropriate safeguards)

How Long We Keep It: 2-7 years depending on data type and legal requirements

Your Rights: Access, correction, deletion, and more - varies by location

Contact Us: info@i-vinettraining.com for any privacy questions or rights requests

This privacy policy complies with UK GDPR, EU GDPR, California CCPA/CPRA, and other applicable US state privacy laws. It is designed to be transparent about our data practices while protecting your privacy rights regardless of your location.