

Privacy Statement



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A: About Us

WuDo Solutions is a trading name of Wuestefeld and Doyle Limited.

We collect data and process data for a range of purposes, and this privacy statement tells you more about them. If after reading this you have any queries about our data protection or handling systems and processes, please contact Michael Wuestefeld-Gray via hello@wudo.solutions or write to 15 Warland Road, London, SE18 2EX, or call 0330 221 0562.

We have created this detailed privacy statement to ensure that we can demonstrate our data collection and processing is lawful, fair, and transparent, and that the steps we take to keep your information accurate are up to date and secure. This document also explains your rights in relation to your data and how you can exercise them.

B: How and Why We Collect Data

We only collect data about people if they:

1. enquire about attending an open course, or webinar, or are organising in-house training
2. sign up/organise; or are signed up by or referred by another person; to attend an open course, webinar, or in-house training
3. sign up to or are signed up to our newsletter
4. have a contractual or other business relationship with us
5. engage with us via our website, phone, email, or social media.

We do not collect identifiable data about visitors to our website. The process of data collection begins when you make contact with us.

Depending on the nature of the relationship we have with you and the data processing activity in question, we will be either the data controller, joint data controller, or data processor. This will be set out for each data processing activity.

1. Course enquiries

We will use the data you give us to communicate with you about your enquiry until you tell us to stop, or you sign up to, or organise training. This information will include:

Your name, location, employment/type of business, training needs and contact details.

We use your information in this way because it is in both our and your legitimate interests to explore the delivery of your training needs.

If you do not decide to take advantage of our training offer, then we may ask you to complete a brief survey telling us why you decided to pursue an alternative option. The survey is online and is anonymous.

This is because it is in our legitimate interests to explore opportunities to improve our services.

At that point, your data processing will stop, and we will delete any identifiable data within six months.

If you do decide to take advantage of our training offer, then we will process your data as set out in section 2.

2. You sign up/organise, or are signed up by or referred by another person, to attend an open course, webinar, or in-house training

We will use **your name, location, employment/type of business, training needs and contact details** and where appropriate, **financial information** to:

- provide you with information about the training organised/signed up to
- set up an account in your name on our on-line learning courses if necessary
- invite you to access pre- and post-course reading and materials
- enable you to access post-course support to apply your learning
- seek and process payment, or take action where payment is not received.

When we are approached to provide in house training, we may undertake credit checks to assure ourselves of ability to pay. The service we typically use is Experian (although we may use others from time to time).

When individuals book training on one of our open courses or webinars, payment is taken at the point of sale, and processed either by PayPal or WePay.

If you attend one of our open courses, we may share your name or other information with the venue for that course, so that you can more easily take part in the training.

For information about third parties we share data with, see Part D.

Your data will be deleted six months after your course takes place. At that point we will no longer have any data about you in relation to your training.

We will also:

- add you to our newsletter mailing list (**see section 3 below**)
- invite you to complete a post course feedback survey.

We do this because it is in your and our interests to provide you with updates and new resources which we disseminate via our newsletter; and it is in our interests to explore opportunities to improve our services. Your membership of our newsletter distribution list is separate from your course attendance. All survey results are completely anonymous.

It is not part of our contract to provide training to do either of these things and you are not obliged to complete the survey or receive the newsletter. We will not use your data in this way if you tell us not to, and you can unsubscribe from the newsletter at any time. For more information about this **see section 3**.

3. You sign up to or are signed up to our newsletter

There are two routes by which your data is used to receive our newsletter.

If you have attended one of our training courses, we add you to our newsletter distribution list because it is in your and our interests to provide you with updates and new resources which we disseminate via our newsletter. We will only use your **name and email address** to send you our regular newsletter.

If you have signed up to our newsletter independently then we will use your **name and email address** to:

- send you our newsletter
- send you any offers, materials, or resources that you signed up to our newsletter to receive
- monitor your engagement with our newsletter and other communication by seeing how frequently you have opened these and engaged with the content
- contact you to explore your expressed interest in any of these offers, materials or resources
- advise you of any relevant or similar offers related to your expressed interests
- advise you that you will be removed from our newsletter distribution list which we will do if it is clear that our newsletter and/or other communications are of no interest.

We use your information in this way because it is in our and your legitimate interests to provide you with information you have requested and explore your interest in any of our training where you have expressed such an interest, in a way that is most relevant and suitable to you.

In either case, you can unsubscribe from our newsletter at any time and at that point all communication via this route will cease, and your data will be erased.

If at any time it appears to us that your information is no longer accurate or up to date, or after a period of not more than 12 months when you have not opened our newsletter, we will remove your details from our mailing list at that time, and your data will be erased.

Our newsletter mailing list is managed by, and our newsletter delivered by, Mailchimp. This is what we and Mailchimp can see and know about you:

What	Yes	No
If you received our newsletter	X	
If you opened our newsletter (including how often and when)	X	
If you read our newsletter		X
If you clicked on any link in the newsletter, and which ones	X	
If you have taken any surveys or quizzes		X
Your individual survey responses		X
If your email address is no longer valid or you unsubscribe	X	

4. We have some other contractual or other business relationship

- We will work with clients and their colleagues/stakeholders to deliver project, programmes, and other services that we have been contracted to provide.
- As part of our work, we will have relationships with partners and suppliers. Examples include collaboration on marketing, financial services, and venues for training.
- We also collect and process data as responsible employers.

When we work with clients and their colleagues/stakeholders we will obtain, process and store information about them that is necessary for the delivery of the services we are contracted to provide. We will keep this information for as long as this contractual relationship exists and may

retain it to comply with statutory and regulatory obligations; and where necessary, to initiate, maintain or defend legal claims.

For our work with partners and suppliers, we collect information such as name, and contact details, to enable us to fulfil our contractual relationship. We will keep this information for as long as this contractual relationship exists and may retain it to comply with statutory and regulatory obligations; and where necessary to initiate, maintain or defend legal claims.

As employers we collect and process a range of information, for a range of reasons:

- Information to satisfy our statutory obligation that colleagues have a right to work in the United Kingdom.
- Information to provide payment, make pension contributions, PAYE deductions, student loan repayment deductions etc.
- Information to process expenses claims and other secondary financial purposes.
- Information to support colleagues to operate effectively as employees which will include:
 - Information about their performance in their role, their development needs and career plans etc.
 - Information that will allow us to make reasonable adjustments to the workplace as necessary, to support colleagues to perform their role effectively.
 - Demographic information to allow us to ensure we exemplify our commitment to equality and diversity at all levels within the organisation.

The information we collect is:

- name and contact information including address
- age
- tax code and national insurance number
- data on annual leave, sickness absence and other absence from work
- qualifications and employment history
- training and development within the role.

We also subscribe staff and colleagues to our newsletter.

We collect this information to comply with statutory obligations, contractual obligations and because it is in the interests of WuDo Solutions and of its staff to support and manage colleagues to deliver effective services.

5. You engage with us on social media

We use a number of social media channels to highlight our products and services, special offers, resources, and other materials. These channels include, but may not be limited to:

- Facebook
- Twitter
- LinkedIn
- Telephone
- Email
- Wordpress (for our blog).

Each of these channels can tell us who has visited, viewed, “liked”, or shared our pages or content. We do not use this information to target visitors with advertisements or marketing materials. We will only contact you if you contact us.

Contacting us includes making comments on any of the content, in which case we may respond or interact with you to clarify what you are asking or saying. We will not use your data for anything else.

When you visit our website, anonymised tracking cookies are installed that allow us to see which pages people have visited, the duration of the visit, and which landing and exit pages on our website people arrived and left by. These cookies also allow targeted “remarketing” campaigns – so you may see an advert for our services on a website you visit subsequently. This activity is anonymous, and we do not need to collect personal, identifiable data to do this.

When you telephone us, calls may be recorded or monitored for quality improvement and tracking purposes.

C: Who has access to your data at WuDo Solutions?

The only people who have access to your data are employees of WuDo Solutions or its parent company, Wuestefeld and Doyle Limited, and they are:

- your trainer, both for the purposes of delivering your training and for post course support.
- the administrator who organises the materials, account, and venue as necessary for each course.
- staff working in social media or marketing, who manage our social media accounts.

D: When and Why We Share Data with Others

There are a small number of external organisations who will store or access your data on our behalf in some circumstances.

Who?	Why?	Legal Basis
Training venues	We may share your name and contact details with the venue for that course, so that you can more easily take part in the training. Under those circumstances, we will be the data controller and the venue will be the data processor, and we will only allow them to have or process your data if: • we are satisfied that the venue requires only the minimum necessary data • we are satisfied the venue will only process your data for the purposes we have agreed, and will not be shared with a third party • we are satisfied that the venue has appropriate data processing and security systems in place • we are satisfied that the venue will keep the data for no longer than necessary.	We share this information because it is necessary for the performance of the contract we have both entered into to provide you with training.
Mailchimp	Mailchimp is the provider of the email service that sends out our newsletter, and other emails, and holds and manages the newsletter distribution list. When you sign up to our newsletter, we provide Mailchimp with your email address and your name .	We share your data because it is in our and your legitimate interests to receive our newsletter.

	Mailchimp does not share your information with anyone else. We are satisfied that Mailchimp has appropriate technical and organisational security systems in place to keep your information safe. Your data is deleted when you unsubscribe, or 12 months after you last opened the newsletter.	Mailchimp's own privacy policy can be found here.
Survey Monkey	Survey monkey is the provider of our pre- and post-course surveys, as well as other surveys and quizzes we provide. We do not give your data to Survey Monkey and all responses are anonymous unless you choose to give us your personal information. However, Survey Monkey does collect some information about you when you access the surveys we create, so it is important you are aware of this. We are satisfied that Mailchimp has appropriate technical and organisational security systems in place to keep your information safe.	We provide the surveys because it is necessary for the performance of a contract (training) or because it is in our legitimate interests to get responses (other). Survey Monkey's own privacy policy can be found here.
Ecwid	Ecwid is the provider of the "online store" where individuals can book themselves onto open courses and webinars. We do not share your data with Ecwid, but it will collect information about you for its own purposes and to let us know of your order, as well as any information you provide with it. We are satisfied that Ecwid has appropriate technical and organisational security systems in place to keep your information safe.	We provide an online store because it is in your and our legitimate interests to enable access to open courses and webinars that we provide. Ecwid's own privacy policy can be found here.
PayPal	It is possible for people to pay for courses using PayPal. We do not provide your data to PayPal, but you may do so to place your order so it is important to note that they may process your data in relation to accessing training. We are satisfied that PayPal has appropriate technical and organisational security systems in place to keep your information safe.	It is necessary to process payment for the performance of a contract. PayPal's own privacy policy can be found here.
WePay	It is possible for people to pay for courses using their credit or debit card, and this service is provided for us by WePay. We do not provide your data to WePay, but you may do so to place your order so it is important to note that they may process your data in relation to accessing training.	It is necessary to process payment for the performance of a contract. WePay's own privacy policy can be found here.

	We are satisfied that WePay has appropriate technical and organisational security systems in place to keep your information safe.	
Powr	Powr provides the pop-ups and enquiry forms on our website. We do not provide your data to Powr, but it will collect information you provide and transmit it to us. Examples include name and contact information.	It is in your and our legitimate interests to facilitate contact with us in relation to our training services. Powr's own privacy policy can be found here.
Zapier	Zapier is an integration engine that allows the transmission of data collected by Powr to Mailchimp. We do not provide your data to Zapier, but it functions to transmit your name, contact information and course preferences to Mailchimp.	It is in your and our legitimate interests to facilitate contact with us in relation to our training services. Zapier's own privacy policy can be found here.
Experian	We typically use Experian for credit checks on organisations asking us to provide in-house training. The kind of information Experian provides is: • financial information • details of directors and holding companies • a credit score.	It is in our legitimate interests to be assured of ability to pay. Experian's privacy policy can be found here.
Debt Collectors	We may if necessary, engage the services of a debt collection agency when payments for training services provided are severely overdue. The data we provide will be limited to the minimum necessary data but will include financial information, name, and contact details. We will only pass on your data to a debt collector as a last resort and if: • we are satisfied they will only process your data for the purposes we have agreed, and will not be shared with a third party • we are satisfied that they have appropriate data processing and security systems in place • we are satisfied that they will keep the data for no longer than necessary.	Payment is necessary for the performance of a contract; and it is in our legitimate interests to secure payment for services provided.
The CPD Certification Service	From time to time, we offer CPD points to attendees of certain courses. We sometimes produce CPD certificates in-house, and sometimes we ask CPD to produce them for us. In order for them to do this, we will provide them with your name, contact details as well as details of	It is in your legitimate interest to have CPD points awarded. It is in our legitimate interest to have our courses independently benchmarked.

	the course you attended and the outcome of the assessment you took to be awarded CPD points.	You can find The CPD Certification Service's privacy policy here .
Dropbox	We use Dropbox for our electronic records. This means any data we hold about you could be stored on Dropbox in line with our retention periods. We are satisfied that DropBox has appropriate technical and organisational security systems in place to keep your information safe.	The legal basis for having and storing your data on Dropbox will be the legal basis of the function we are performing when obtaining and processing your data. Dropbox's privacy policy and security information can be found here.
Add People	We use Add People to help track visits to our website and advise us on routes to improve content and engagement. They will also use this data via cookies to provide remarketing services. Add People also help us to optimise our telephone services by helping us to monitor the source, content, and outcome of telephone enquiries. We are satisfied that Add People has appropriate technical and organisational security systems in place to keep your information safe.	It is in our and clients'/customers' legitimate interests to use anonymised data to monitor visits to our website, and to use limited personal data to monitor and improve engagement with our services. Add People's privacy information can be found here:
Any other third party	There may be third parties with whom we may share data. Examples may include the Police, or some other investigatory or statutory body. In these circumstances, we will only share the minimum necessary data securely, and on the grounds of an identified legal basis.	Dependent on the specific situation but we will always ensure there is an appropriate legal basis for the data sharing requested.

E: Your Rights

Data protection legislation sets out a number of rights and alongside our commitment to the highest standards of information governance, we are happy to facilitate you exercising those rights which are listed below:

1. You have the right to be informed

We comply with this right by providing you with this privacy statement, giving you the opportunity to know what we use data for and why, before you provide it.

2. You have the right to access your information

You can do this by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

We will provide you within 30 days, and free of charge, anything you ask for of the following:

- a copy of the information we hold about you
- what we have used the information for
- who we have shared this information with, if anyone
- how long we will keep this information.

We can then also confirm:

- your information has not been used for automated decision making
- your information has not been transferred to another country.

We reserve the right to refuse requests where complying would involve a disproportionate burden on our organisation and its resources, which would typically but not exclusively be if we are in receipt of repeated and frequent requests. If we decide not to comply with your requests, we will explain why.

3. You have the right to have your information corrected

If you believe information we hold about you is inaccurate or out of date, then you can ask us to correct it. If after checking, we find the information is inaccurate or out of date then we will correct it.

You can do this by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

We reserve the right to retain information that we reasonably believe is accurate or up to date but we will record your own views in your records to ensure your perspective is taken into account.

Please note that while you have every right to disagree with subjective data such as opinions, disagreeing with an opinion does not make it inaccurate.

4. You have the right to have your information deleted

If you wish to have your data deleted then you can do this by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

Please note that in some circumstances, we may have a legal or contractual obligation to retain your information or decide that it is in our legitimate interests to retain information for another reason that outweighs your right to have your information deleted. If this situation occurs, we will tell you why this is the case.

Please note that if your data is deleted, we will have no memory of you, and therefore we will not be able to guarantee that we will not have data about you in the future.

5. You have the right to have your data transferred to another organisation

If you would like us to transfer your data to another organisation then you can do this by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

We will transfer your data electronically and, in a machine-readable format to the destination you specify, free of charge and within 30 calendar days of your request.

6. You have the right to restrict the purposes we use your data for

This right is to be used if you:

- are challenging the accuracy of your data
- are challenging the lawful basis of us having your data
- want us to keep your data for longer than we usually would, but do not want us to process it while we have it.

Under these circumstances, you can tell us to stop processing your data until the issues relevant to each of these circumstances have been resolved. This means that for the relevant period we will only store your data and will not use it, without your express consent.

You can do this by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

7. You have the right to object to the processing of your data

You can object to the processing of your data, and where appropriate, when you do so we will stop. You can object absolutely to the use of your data for sending out our newsletter and you can exercise this right by:

- unsubscribing from our newsletter or
- by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

You can also object to our using your data for any of the purposes set out above, except where there is a legal obligation to perform the data processing.

You can exercise this right by calling 0330 221 0562, emailing hello@wudo.solutions, or writing to 15 Warland Road, London, SE18 2EX.

Please note however, you will need to give your reasons for your objection so that we can consider them and balance them against our own interests in continuing the data processing. We will always try to comply with your wishes, and if we can't, we will explain why.

8. Rights relating to automated decision making and profiling

You have the right to object to decisions being made about you in a purely automated way, or decisions being made about you based on your characteristics (profiling).

We do not do either of these at WuDo Solutions.

F: What Else We Do and What We Don't Do

There are a small number of other data processing activities we may undertake on a case-by-case basis. There are also some data processing activities we do not do. These are summarised here.

What we do:

- we reserve the right, under exceptional circumstances, to record telephone conversations in order to initiate, maintain, or defend ourselves from legal claims.
- we reserve the right to maintain records for longer than we normally do, as set out above, in order to initiate, maintain, or defend ourselves from legal claims.

What we don't do:

- we don't process special categories of data about identifiable individuals outside of a necessity to do so for employment purposes.
- we don't collect identifiable information from visitors to our website, but we do use tracking cookies for analytics purposes only. This means we use cookies to know how many people visited our website, what pages they visited, and the journey they took from arrival to leaving the site. We do not collect anything about who these people are; just what they do. We do this because it is in our legitimate interests to explore opportunities to improve our services.
- therefore, we do not undertake activity such as remarketing etc.
- we do not transmit data about EU citizens to third countries, or store or access it there.
- we do not undertake automated data processing for the purposes of decision making or anything that could have a legal or financial impact on any person.

G: Data Security

We practise the highest standards of data security by:

- training our staff in information governance
- using secure cloud computing services (Dropbox) with role-based access to information
- we have a secure office with 24-hour security
- all data is transmitted securely (within our own email domain/firewalls; and using https)
- we do not generate paper copies of personal data except for course sign in sheets which are scanned and destroyed after courses have been completed.