Privacy Notice

How we collect, use and protect your personal information

Version: 2.0 **Effective from:** 11/10/2026 **Next review:** 30/09/2027

1. About this notice

This notice explains how The Managers Training Company Ltd ("TMTC", "we", "us") collects, uses, shares and protects personal information, and what your rights are. We have written it in plain English. If anything is unclear, please get in touch.

It applies to everyone whose personal information we handle, including:

- staff at schools, colleges and other organisations who commission our services
- people who attend our training, masterclasses and leadership programmes
- coaching clients
- members of our online leadership programme, Lead With Impact
- newsletter subscribers and people who make enquiries
- visitors to our website
- associates, suppliers and other business contacts.

2. Who we are and how to contact us

The Managers Training Company Ltd is the "controller" of your personal information. This means we decide how and why it is used, and we are responsible for looking after it.

	Details
Company name	The Managers Training Company Ltd
Registered in	England and Wales, company number 15047891
Registered office	Suite 106, 7-8 New Road Avenue, Rocheter ME4 6BB
ICO registration number	ZB731697
Data protection contact	Tracy-Anne Barker Director
Email	tracy-anne@themanagerstrainingcompany.co.uk
Telephone	01622 232000

We are a small organisation and are not required to appoint a Data Protection Officer. Our Director is responsible for data protection.

3. The information we collect

We only collect the information we need. What we hold depends on how you work with us.

Who you are	What we may collect	Where it comes from
School, college or organisation contact (the person who commissions our work)	Name, job title, organisation, work email and phone number, contract and invoicing details, correspondence	You, your organisation, or publicly available sources such as your organisation's website
Training or programme participant	Name, job title, organisation, work email, attendance, course feedback and evaluations, any work you complete during the programme	You, or your employer when booking you onto a programme
Coaching client	Name, contact details, role, session dates, brief coaching notes and agreed actions, any progress information your organisation has asked us to share (agreed with you in advance)	You, and your employer where they commission the coaching
Lead With Impact programme, other online training or coaching programmes members	Name, email, organisation, role, login details, course progress and completion, payment records	You, and the online platform we use to host the programme
Newsletter subscriber or enquirer	Name, email, organisation and role (if given), your marketing preferences, the content of your enquiry	You, for example through our website, LinkedIn or an event
Website visitor	Information your browser sends, such as IP address, browser type and pages visited, gathered through cookies or similar technologies (see section 10)	Your device, through our website.
Associate or supplier	Name, business contact details, contract, insurance, qualification and payment details	You

More sensitive information

Some information is given extra protection by law. This includes information about health, ethnicity, religion, sexual orientation and similar matters. We do not ask for this as a matter of course. We may hold it in two situations:

- **Access and reasonable adjustments.** If you tell us about an access need, disability or dietary requirement so we can support you during training, we will use it only for that purpose and with your agreement.
- **Coaching conversations.** Coaching can touch on personal matters. We keep coaching notes brief, factual and confidential, and record sensitive details only where it is genuinely necessary to support you.

We do not routinely collect information about criminal convictions.

Information about pupils and students

Our services are for adults. During training or coaching, we ask participants not to share information that identifies individual pupils, students or colleagues. If it does happen, we do not record it unless there is a safeguarding concern (see section 4).

4. How we use your information and our lawful basis

Data protection law says we must have a valid reason, called a "lawful basis", for each way we use personal information. The table below sets out what we do and why.

What we use it for	Our lawful basis
Delivering training, coaching and online programmes such as Lead With Impact, or other online coaching and training programmes including bookings, joining instructions, resources and certificates	**Contract:** where you have a contract with us. **Legitimate interests:** where your employer has contracted us and you are taking part as a member of their staff. Our interest is delivering the service your organisation has asked for.
Collecting feedback and evaluating impact, and giving your organisation agreed reports (for example attendance or an anonymised summary of evaluations)	**Legitimate interests:** to improve our services and to give commissioning organisations the information they need. We tell participants at the start what will be shared.
Managing our business: contracts, invoicing, payments and accounts	**Contract** and **legal obligation** (for example tax and company law)
Responding to enquiries and keeping in touch with business contacts	**Legitimate interests:** to run and develop our business
Sending newsletters and information about our services	**Consent**, or for existing clients, **legitimate interests** where you have bought or asked about similar services and did not opt out (the "soft opt-in"). For business contacts at organisations, **legitimate interests**. You can unsubscribe at any time.

What we use it for	Our lawful basis
Website analytics and cookies	**Consent** where required (see section 10)
Making reasonable adjustments	**Legitimate interests** and your **explicit consent** for any health information
Safeguarding: acting on a concern about the safety of a child or adult at risk	**Legal obligation** or **legitimate interests**, and the substantial public interest conditions for safeguarding in the Data Protection Act 2018
Handling complaints and requests to exercise your rights, and defending legal claims	**Legal obligation** and **legitimate interests**

Where we rely on consent, you can withdraw it at any time by contacting us or using the unsubscribe link in our emails. We do not make decisions about you using solely automated processes, and we do not sell your information.

Coaching and confidentiality

Coaching is confidential between you and your coach. Where your organisation has commissioned the coaching, we agree with you at the start exactly what, if anything, will be reported back, for example attendance or broad themes. The only exception is where we believe someone is at risk of serious harm, when we may need to share information with the appropriate person. Wherever possible, we will talk to you first.

5. Who we share your information with

We only share personal information where we need to, and only what is necessary:

- **Associate trainers and coaches** who deliver work on our behalf, under written agreements that require them to keep your information confidential and secure.
- **The organisation that commissioned our work**, limited to what has been agreed (see section 4).
- **Service providers** who help us run our business. They act on our instructions under contracts that protect your information (see the table below).
- **Professional advisers**, such as our accountant, insurers and legal advisers.
- **Regulators, law enforcement or other authorities**, where the law requires it or to protect someone from harm.

Service	Provider
Email, documents and file storage	Outlook, Microsoft 365
Online meetings and training	Zoom, Microsoft Teams
Newsletters and email marketing	Outlook, Mailerlite, LinkedIn
Lead With Impact, training and coaching programmes - online platform	New Zenler
Accounting and invoicing	Xero
Website hosting	HubFizz
Online forms and surveys	Microsoft Forms

6. Transfers outside the UK

Some of our service providers store or access information outside the UK, for example in the European Economic Area or the United States. When this happens, we make sure your information is protected, either because the country is recognised by the UK government as providing adequate protection (including the UK-US "Data Bridge"), or by using approved contract terms such as the International Data Transfer Agreement. You can contact us for more information.

7. How long we keep your information

We keep personal information only for as long as we need it, then delete or securely destroy it. Our standard retention periods are:

Type of information	How long we keep it
Enquiries that do not lead to work	12 months from our last contact
Training and programme records (bookings, attendance, evaluations)	3 years after the programme ends
Coaching notes	6 months after the coaching relationship ends
Lead With Impact, online coaching and training accounts	While your membership is active, then 12 months

Type of information	How long we keep it
Contracts, invoices and financial records	6 years after the end of the financial year they relate to (required by law)
Newsletter subscribers	Until you unsubscribe. We keep a minimal record so that we do not contact you again
Complaints and rights requests	3 years after the matter is closed
Associate and supplier records	6 years after the agreement ends

8. Keeping your information secure

We use appropriate technical and organisational measures to protect personal information, including password protection and multi-factor authentication, secure cloud services, encryption when sending sensitive files, and confidential disposal of paper records. Associates who handle personal information on our behalf must follow the same standards.

If a data breach happens that is likely to put your rights at risk, we will report it to the Information Commission where required, and tell you if there is a high risk to you.

9. Your rights

You have the following rights over your personal information:

- **To be informed** about how we use your information. This notice does that.
- **Access:** to ask for a copy of the personal information we hold about you (a "subject access request").
- **Rectification:** to have inaccurate or incomplete information corrected.
- **Erasure:** to ask us to delete your information in certain circumstances.
- **Restriction:** to ask us to limit how we use your information.
- **Objection:** to object to us using your information based on our legitimate interests, and to stop direct marketing at any time.
- **Data portability:** to receive information you gave us in a commonly used electronic format, or have it sent to another organisation, in certain circumstances.
- **Withdraw consent** at any time, where we rely on your consent.
- Rights relating to **automated decision-making**. We do not make decisions about you by solely automated means.

To use any of these rights, contact us by email, phone or letter using the details in section 2. You do not need to use a particular form or particular wording, although our

Subject Access Request guidance and form are available if they help. There is normally no charge.

We will respond within one calendar month. If your request is complex, we may extend this by up to two further months and will tell you why. We only ask for proof of identity if we are unsure who you are. If we do, or if we need to clarify your request, the time limit starts once we have what we need. We will carry out reasonable and proportionate searches for your information.

10. Cookies

Cookies are small files that a website places on your device. Our website uses:

- **Essential cookies** needed for the website to work. These do not need your consent.

Where the law requires it, we ask for your agreement through our cookie banner before setting non-essential cookies. You can change your choices at any time through the cookie settings link at the bottom of our website or through your browser settings.

11. How to complain

If you are unhappy with how we have handled your personal information, please tell us first so we can put things right. You can contact us by email, phone or letter (section 2), or by using our online complaint form. Our **Complaints Policy** explains the process. In summary, we will:

- acknowledge your complaint within 30 days (we aim to do so within 7 working days)
- look into it without undue delay and keep you informed of progress
- tell you the outcome and explain our reasons.

You also have the right to complain to the UK data protection regulator at any time. The regulator was known as the Information Commissioner's Office until 30 September 2026. It is now the **Information Commission** but is still referred to as the ICO:

	Information Commission (ICO)
Website	ico.org.uk/make-a-complaint
Helpline	0303 123 1113
Post	Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

The regulator will usually ask you to raise your concern with us first.

12. Changes to this notice

We review this notice at least once a year and whenever the way we use personal information changes. The latest version will always be on our website; with the date it

took effect shown on the front page. If we make significant changes, we will let current clients and participants know.

13. Related documents

- Complaints Policy
- Subject Access Request guidance and form
- Data Protection Policy (internal)

These are available on our website or on request.