

# Privacy policy for the data processing and terms of use

## The purpose of this policy

321Leader Ltd (hereinafter referred to as “Company”) processes personal data through its website [www.321leader.com](http://www.321leader.com), related to the services and functions it provides that is organisation of mentoring process, organisation of related workshops and trainings, as well as providing relating services.

The terms used in this statement have been interpreted in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), Article 4.

The Company considers it important to inform the data subjects about the main characteristics and circumstances of its data processing activities. Visiting our website does not require registration.

## Handling your personal data

Your personal data is handled by **321Leader Ltd** as the data processor:

*Location:*               **22 Brunswick Close**  
*E-mail:*                 **info@321leader.com**  
*Website:*               **www.321leader.com**  
*Phone:*                 **+44 7598 699577**

Data protection remarks can be addressed to [info@321leader.com](mailto:info@321leader.com)

The recipients of the personal data can also participate in handling the data. More information about can be found under the headings ***“Additional privacy statement for submitting to establish contact or to register to mentoring database or an inquiry about white label mentoring program through [www.321leader.com](http://www.321leader.com)”***

## Principles considered by Company as important when handling personal data

During the course of its data processing activities, the Company respects the individual rights of the data subjects and handles their personal data in accordance with relevant legislation, guaranteeing the implementation of the provisions of GDPR, the Law CXII of 2011 on the right to self-determination as regards information and freedom of information, and the relevant sectoral laws.

The protection of the personal data provided is ensured by taking all possible and necessary technical and organizational measures. Special attention is given to ensure the confidentiality, integrity, and availability of personal data. The Company takes responsibility for the truthfulness and accuracy of personal data as given by the data subject.

## **Data subjects**

The data subjects concerned in the data processing activities related to the operation of the website are persons establishing contact with the Company during initial registration process to the Company mentoring tool, persons appearing in the images published on the website, individuals submitting personal data for the participation in the mentoring process, users of the services provided by the Company, mentors/coaches and other experts, content providers, sponsors, media partners and event speakers.

## **Rights regarding your personal data handled by the Company**

If the Company processes your personal data, your rights based on GDPR are the following, with the Company's obligation to keep to a one-month deadline:

- **the right to information and access to personal data:** The data subject shall have the right to obtain from the data processor confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data; the categories of personal data concerned; the purposes of the processing; the recipients or categories of recipient to whom the personal data have been or will be disclosed; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; information on the existence of the right to request from the Company rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; information on the right to lodge a complaint with a supervisory authority.
- **the right to rectification (right of correction):** The data subject shall have the right to obtain from the data processor without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **the right to erasure (right to be forgotten):** The data subject shall have the right to obtain from the Company, without undue delay, the erasure of personal data that has been processed based on his or her consent.
- **the right to restriction of processing:** The data subject shall have the right to obtain from the Company restriction of processing if the accuracy of the personal data is contested by the data subject, or if the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; or if the Company no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; or if the data subject has objected to processing pending the verification whether the legitimate grounds of the Company override those of the data subject.

- **the right to object:** The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, when processing is necessary for the purposes of the legitimate interests pursued by the Company or by a third party. The Company shall not cease to process the personal data if the Company demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.
- **the right to data portability:** The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Company, in a structured, commonly used and machine-readable format and have the right to transmit those data to another data processor, if the processing is based on consent, or consent to the processing of special categories of personal data for one or more specific purposes, or on a contract; and the processing is carried out by automated means.

### **Legal remedies considering processing of your personal data**

If you have any complaint about the way the Company handles your personal data, we suggest that you contact us directly. We are committed to examining every complaint and doing our best to deal with it appropriately. In case you still have objections to the way we handle your data after contacting us with your complaint, or if you do not wish to contact us first, you may seek the following legal remedies:

#### The right to lodge a complaint with a supervisory authority

Every data subject shall have the right to lodge a complaint with the Information Commissioner's Office (ICO) (hereinafter referred to as Supervisory Authority or ICO), if the data subject considers that the data processor authorised by him or her committed an infringement of the regulations.

Contact information for the Information Commissioner's Office (ICO):  
<https://ico.org.uk/global/contact-us/>

### **Cookie policy**

Our site [www.321leader.com](http://www.321leader.com) uses cookies. Cookies are data packets consisting of letters and numbers, which the website sends to your browser in order to save certain settings, make the website more user friendly and contribute to the collection of statistically relevant information.

#### **Types of cookies used:**

Cookies may be „persistent” or „temporary”. Persistent cookies are stored on the browser for a specified time, if the user does not delete them earlier. Temporary or session cookies are not stored, they are automatically erased once the browser is closed.

Strictly necessary cookies are needed for the basic functions of the website to run and the website cannot be used properly without them as several functions will become unavailable by disabling these.

Cookies to improve user experience collect information about user activities on the website, such as the most frequently visited pages, or the error notifications received by the users. Cookies do not collect data that would enable the personal identification of the user. The data collected is used to improve website performance.

### **Disabling cookies:**

If you do not wish to consent to the use of cookies, you can go to the settings of your own browser and disable or block them. This may prevent or restrict the use of some services. More information on deleting cookies in your browser settings.

## **Additional privacy statement for submitting to establish contact or to register to mentoring database or an inquiry about white label mentoring program through [www.321leader.com](http://www.321leader.com)**

### **Purpose of collecting and processing personal data**

The purpose of collecting and processing personal data is to register and evaluate your mentoring questionnaire and other related documents (e.g. resume) during the mentoring process, as well as establishing contact with the applicants requesting information on white label programs.

### **Types of data collected**

The Company collects your **name** (last name/ first name), **birth name**, **photo**, **mailing address**, **telephone number**, **e-mail address**, information on your **education/training**, **professional experience**, **current workplace**, **language for mentoring process**, **interests**, and **other personal data included in your resume, LinkedIn profile** and handles these as personal data/information.

### **Legal basis for processing your personal data**

Based on point (a) of Article 6(1) of GDPR, the consent of the data subject to the processing of his or her personal data serves as the legal basis.

You may withdraw your consent at any time, however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

### **Recipients of your personal data**

The personal data collected by the Company can be accessed by its employees responsible for the administration and evaluation of mentoring applications. The personal data in the mentoring applications sent electronically may be accessed by data processors working for our hosting service providers.

Your personal data will not be disclosed to third parties without your consent, with the exception of official authorities, if their access request has a valid lawful basis.

**How long will we keep your personal data?**

Your personal data will be kept until the withdrawal of your consent, or until the mentoring applicant is informed about the rejection of his or her application.

**Valid from: January 1, 2020**

***321Leader Ltd***