

# Privacy Notice

This Privacy Notice, together with our [Cookie Notice](#), sets out how we, **Performance Coaches Ltd**, collect, use and share your personal data in accordance with the EU General Data Protection Regulation (GDPR). It also explains what rights you have.

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## Who is responsible for your data?

Performance Coaches Ltd is responsible for your data. Our address is Level 2 The Fort, Hardrocks Business Park, Burmarrad Road, Naxxar NXR 6345, Malta. We are registered as a company in Malta under company number C 99591. We are the data controller which means we decide how your data is used and protected. We remain committed to keeping your personal information safe.

## What personal data do we collect about you?

Your personal data is information which by itself or with other data available to us can be used to identify you. The information we collect depends on how you use our products and services. Through the use of cookies and similar technologies, we can collect information about the devices you use to interact with our websites, learning platforms and apps (collectively, “sites”). See our [Cookie Notice](#) for more information.

The table below lists the different kinds of personal data we might collect about you:

Type of personal data	How we collect the data
Your name, company name, job title, department, IP address, user name, password and contact details (email addresses, telephone numbers, address)	<ul style="list-style-type: none"><li>○ When you create a user account on any of our sites</li><li>○ When you contact us by post, telephone or email</li><li>○ When you give us your business card</li><li>○ When you request to receive our newsletters, alerts and other marketing communications</li><li>○ When you respond to a request for information</li><li>○ When you fill in one of our forms or surveys</li><li>○ When your employer gives your data to us</li><li>○ When legitimately provided to us by a third party</li><li>○ When you make the information publicly available for business opportunities</li><li>○ When you connect with us via social media</li></ul>
Information about our products and services you use or are interested in	<ul style="list-style-type: none"><li>○ When you purchase or request information about our products and services</li><li>○ When you open our marketing emails</li><li>○ When you interact with our marketing materials</li><li>○ When you attend our events or webinars</li></ul>

Information about your membership of one of our online services	<ul style="list-style-type: none"> <li>○ When you interact with our online services</li> </ul>
Information about your education and career, skill level, qualifications, professional membership, languages proficiency	<ul style="list-style-type: none"> <li>○ If you have publicly released this information for business purposes</li> <li>○ When you respond to our request to provide this information</li> <li>○ When you fill in our registration forms and surveys</li> <li>○ When you send us your curriculum vitae</li> </ul>
More sensitive information about you and about your health, dietary requirements, religious and philosophical beliefs  <i>By providing any sensitive personal data, you explicitly agree that we may collect it and use it to provide services to you. Information obtained during a coaching session is strictly confidential and will not be shared without your consent</i>	<ul style="list-style-type: none"> <li>○ If you ask for special assistance</li> </ul>
Information about your learning and work activities and experiences	<ul style="list-style-type: none"> <li>○ When you register for or participate in any of our courses</li> <li>○ When you access our digital learning resources</li> <li>○ When you agree to being filmed or recorded</li> <li>○ When you fill in our feedback forms or surveys</li> <li>○ When you use our public bulletin boards and discussion forums</li> </ul>
The communication we have with you (emails, letters, recorded telephone calls, online chat messages, messages sent through our social media platforms)	<ul style="list-style-type: none"> <li>○ When you get in touch with us</li> <li>○ When we respond to you</li> <li>○ When you respond to us</li> <li>○ When you provide feedback</li> </ul>
Information about you, your interests and preferences, your location and how you search for and use our sites, the device and web browser you use, and the site from which you arrive (IP address, device identifier, web browser and browsing information)	<ul style="list-style-type: none"> <li>○ When you visit and interact with our sites if you accept cookies placed on your device</li> <li>○ When you update your account information</li> <li>○ When you open our marketing emails</li> <li>○ When you click on our marketing banners</li> <li>○ When you fill in one of our forms or surveys</li> <li>○ When you get in touch with us</li> <li>○ When you provide feedback</li> <li>○ When you opt in to receiving messages from us</li> </ul>

## How do we use your personal data?

We use your personal information to answer your enquiry or training application, to provide information, products and services to you, to manage our relationship with you, and to create new and improved products and services. We will send you appropriate marketing communications if you have given your consent for us to do so.

Below, we have set out the different ways in which we might use your personal data, and the lawful basis for using that data. When the reason is because it is in our legitimate interests, we give the details. We will not unfairly put our legitimate interests above what is best for you.

What we use your personal data for	Lawful basis for use	Details of our legitimate interests
<ul style="list-style-type: none"> <li>○ To communicate with you</li> <li>○ To manage our relationship with you</li> <li>○ To administer your coaching, mentoring, training, assessment and certification</li> <li>○ To deliver training materials to you</li> </ul>	<ul style="list-style-type: none"> <li>○ Fulfilling contracts</li> <li>○ Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Keeping our records up to date, working out which of our products and services may interest you</li> </ul>

<ul style="list-style-type: none"> <li>○ To request feedback</li> <li>○ To understand and respond to your requirements, requests for information, queries, concerns, comments and feedback</li> <li>○ To notify you about changes to our service and updates to our policies, agreements and terms and conditions</li> </ul>		<ul style="list-style-type: none"> <li>○ Developing products and services and what we charge for them</li> <li>○ Identifying or defining types of customers for new products of services</li> <li>○ Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</li> </ul>
<ul style="list-style-type: none"> <li>○ To improve your experience of our online services, provide content in the appropriate language and customized according to your device</li> <li>○ To help you log in to our sites</li> <li>○ To manage your account preferences and password</li> <li>○ To publish files and content that you choose to contribute to our sites</li> <li>○ To understand more about your preferences</li> <li>○ To personalize the service we offer to you</li> <li>○ To help you complete a purchase</li> <li>○ To facilitate the technical functioning of our sites, security and troubleshooting</li> </ul>	<ul style="list-style-type: none"> <li>○ Fulfilling contracts</li> <li>○ Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Keeping our records up to date, working out which of our products and services may interest you</li> <li>○ Developing products and services and what we charge for them</li> <li>○ Identifying or defining types of customers for new products of services</li> <li>○ Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</li> </ul>
<ul style="list-style-type: none"> <li>○ To inform you about our news, insights, products, services, promotions</li> </ul>	<ul style="list-style-type: none"> <li>○ Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Networking and growing the business</li> <li>○ Keeping our records up to date, working out which of our products and services may interest you</li> <li>○ Developing products and services and what we charge for them</li> <li>○ Identifying or defining types of customers for new products of services</li> </ul>
<ul style="list-style-type: none"> <li>○ To send you news, insights and marketing communications you subscribe to</li> <li>○ To include your reviews and feedback on our sites and in our sales and marketing communications</li> </ul>	<ul style="list-style-type: none"> <li>○ With your consent</li> </ul>	
<ul style="list-style-type: none"> <li>○ To run our business in an efficient and proper way</li> <li>○ To fulfil our administrative purposes including accounting, billing and audit</li> <li>○ To meet our health and safety responsibilities.</li> <li>○ To improve our services</li> <li>○ To manage how we work with other companies that provide goods and services to us and our customers</li> <li>○ To protect our business interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</li> <li>○ Identifying ways to improve the way we deliver our services</li> </ul>

<ul style="list-style-type: none"> <li>○ To develop and manage our brand, products and services</li> <li>○ To test new products and services</li> <li>○ To carry out, analyse and report on research, surveys, assessments and feedback</li> <li>○ To tailor our services and products according to your preferences</li> <li>○ To inform our marketing strategy, and to provide management information</li> <li>○ To analyse our sites, and evaluate the performance of our content, interest in our products and effectiveness of our marketing campaigns</li> </ul>	<ul style="list-style-type: none"> <li>○ Fulfilling contracts</li> <li>○ Our legitimate interests</li> </ul>	<ul style="list-style-type: none"> <li>○ Keeping our records up to date, working out which of our products and services may interest you</li> <li>○ Developing products and services and what we charge for them</li> <li>○ Being efficient about how we fulfil our contracts, provide our services and fulfil our legal duties</li> <li>○ Identifying ways to improve the way we deliver our products and services</li> </ul>
<ul style="list-style-type: none"> <li>○ To comply with a legal obligation</li> <li>○ To address a complaint or grievance</li> </ul>	<ul style="list-style-type: none"> <li>○ Fulfilling contracts</li> <li>○ Our legal duty</li> </ul>	

### How long do we keep your data?

We will keep your data only for as long as we need it. How long we need data depends on what we are using it for, whether that is to provide services to you, for our own legitimate interests or so that we can comply with the law. We will review the information we hold and when there is no longer a customer, legal or business need for us to hold it, we will either delete it securely or in some cases anonymize it.

### How do we protect your data?

We protect your personal data against unauthorised access, unlawful use, accidental loss, corruption or destruction. We use technical measures such as encryption and password protection to protect your data and the systems they are held in. We also use operational measures to protect the data. We keep these security measures under review and refer to industry security standards to keep up to date with current best practice.

### Who do we share your personal data with?

We may share your personal data with the following categories of third party processors, all of which are located inside the European Economic Area (EEA):

- our email services providers
- our data hosting service providers
- our website hosts, operators and IT support providers
- our survey providers
- our EU based Associates (trainers, facilitators, coaches, mentors, consultants)
- our publishers, printers and delivery service providers
- our financial services and payment service provider
- our auditors, technical consultants and legal advisors

We will make sure that all third parties respect your personal data and comply with data protection laws. They are not permitted to use or share your personal data except as necessary to perform services on our behalf or to comply with legal requirements.

If we do transfer data outside the EEA, we will make sure that it is protected in the same way as if it were being used in the EEA. We will use one of the following safeguards to ensure that it is protected:

- Transfer the data to a non-EEA country which is recognized by the European Commission to have privacy laws at least as protective as those within the EEA
- Put in place a contract with the recipient of the data which means the recipient must protect the data to the same standards as required within the EEA
- Transfer it to organizations which are part of the Privacy Shield. The Privacy Shield is a framework which sets out the standards for data to be sent between the United States and European countries.

We will only share your credit and debit card information with our payment card and fraud management services providers in order to process payments and prevent and detect fraud.

We will share your data as needed for security, legal compliance, auditing or as part of a corporate restructuring.

### **What are your rights and how can you withdraw consent?**

To exercise any of your rights, contact us:

*Performance Coaches Ltd  
Level 2 The Fort  
Hardrocks Business Park  
Burmarrad Road  
Naxxar NXR 6345  
Malta  
Email [info@performancecoaches.com](mailto:info@performancecoaches.com)*

- You can withdraw consent at any time. We act on withdrawals of consent as soon as we can.
- You can ask for a copy of the personal data that we hold about you.
- You can ask for your data to be amended, corrected or deleted.
- You can limit, restrict or object to our processing of your data.
- You can ask us to change your contact preferences or you can use any unsubscribe options available in the communications.

When you get in touch, we will come back to you as soon as possible within one month.

*This Privacy Notice last updated May 2023*