



# Thinking Through ...Academy

Contact Privacy Notice V1.0



## About us

We are Associate Development Solutions Ltd. (registered company number 7486948), a growing independent company specialising in children's and young people's mental health, providing bespoke solutions for service transformation, leadership and professional development, and research and evaluation.

Our address is:

*Associate Development Solutions Ltd.*

*Spaces - Pennine Five, Block 2,*

*1 Tenter Street,*

*Sheffield,*

*S1 4BY*

## What this notice is about

When you use our website, we may collect some information about you. This information is called *personal data* and this notice tells you what we collect and how we use it and share it, as well as important things like your legal rights.

## Where we get your data from

We get your data from you directly when you contact us – for instance, by sending us an email, filling in our contact form or booking an appointment with our team.

## How we use your data

To offer you the best possible service and support, we collect the following personal data and use it for the reasons described:

Contact details	
<b>What we collect</b>	Your name, email address, phone number and any other information you may choose to disclose when you contact us.
<b>Why we collect it</b>	To enable us to communicate with you. To enable us to evaluate our service. To market our services to you if we have your permission.

## How we keep your personal data safe

We know how important it is to look after your personal data, so here are some of the things we do to protect it:

- We only use the personal data we really need;
- We train our staff how to use and share your data safely;
- We use security measures like strong passwords and encryption<sup>1</sup>;
- We make sure we store and send data using secure technologies;
- We make sure that only people with permission can access your data;
- We only work with companies who promise to look after your data too.

## How we share your personal data

Sharing your data means letting people or organisations who aren't part of our company use your data too. We only do this when we need to and we take great care of your data when we do.

### Sharing with our temporary staff

To provide our services, we may need to share your personal data with people who work for us temporarily. These are people we trust to work for us when we don't have enough people on our team, or we need people with particular skills, such as training facilitators (we call these our *associates*).

The tables below explain what we share, who we share it with and why.

Contact details	
Who we share with	Why we share
<b>Associates and administrative staff</b>	To enable them to communicate with you, for instance if you make an enquiry, or you choose to sign up for a service like training.  To enable them to evaluate the ThinkingThrough Academy service.  To market our services to you if you agree to this.
<b>Technical staff</b>	To enable them to fix a problem with our software and systems, which in rare circumstances may require them to access your data.

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<sup>1</sup> Encryption means we turn your data into a code that can only be read by the people we trust.



## Sharing with other organisations

Sometimes, other organisations help us to run our service. These organisations may be in the UK or in another country, including countries outside the European Union (EU). Whenever we do this, we only use organisations that promise to look after your data according to UK law.

The table below tells you about the organisations we work with today, what we share with them and why. In future, we may use different organisations for the same purpose; for instance, if they offer better value or features. If this happens, we will not change the type of data we share, or how it is used, without telling you first.

Contact details and health data	
Who we share with	Why we share
Microsoft 365	We use Microsoft 365 tools for things like email and data storage and to deliver online training. This involves storing your data on Microsoft's systems. You can read more about how Microsoft uses your data by reading their <a href="#">privacy statement</a> .
Adobe	We use Adobe tools for things like writing reports and looking at data. This may involve storing some of your data on Adobe's systems.
123-Reg	We use 123-Reg for email, which means any personal data we send or receive may be stored on their systems.
Zoho	We use Zoho tools, such as Zoho Survey, to measure how well our services are doing, or to collect information from our clients.

## Our data retention policy

When we collect your data, we only keep it for as long as we need to. The maximum length of time depends on the type of data, as shown below:



Type of data	The maximum length of time we keep it for
Contact data	7 years after your last contact with us

Once we no longer need your data, we will securely delete it unless we have good reason, such as a legal requirement to keep it.

## Your personal data and the law

The law says we must have a good reason to use your data. This is called our *lawful basis* and there are six to choose from. When you contact us, we use more than one lawful basis because we use your data in different ways. The tables below tell you which lawful basis we use in each case, along with other information that you may find useful:

Activity	Our lawful basis	What else we need to tell you
Communicating with you if you contact us via our website	<i>Legitimate interests</i>	<p>We use this basis because:</p> <ul style="list-style-type: none"> <li>• We want to be able to respond to your enquiry;</li> <li>• We can't respond unless we have your contact details;</li> <li>• We believe the risk to you is low (because we will take care of your data), while the benefit is high (because we can respond to your enquiry).</li> </ul>
Telling you about our services (marketing)	<i>Consent</i>	We only market our services to you with your consent and you can opt out at any time.

Evaluating our services	Legitimate interests	<p>We use this basis because:</p> <ul style="list-style-type: none"> <li>• We want to keep improving our services so that they are better for you and our future clients;</li> <li>• We can't do that effectively without using your data to measure how well our service has worked for you;</li> <li>• We also believe that the benefits of improving our service for you and others are greater than the risks of accessing your data.</li> </ul>
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If you have any questions or concerns about the use of your data, please let us know at the above address, or by email at [data@thinkingthrough.com](mailto:data@thinkingthrough.com).

## Your rights

The law gives you some important rights that help protect you and your personal data:

- The right to be informed *...to know who we are and how we use your data*
- The right of access *...to find out what data we have about you*
- The right to rectification *...to ask us to correct mistakes in your data*
- The right to erasure *...to ask us to delete your data*
- The right to restrict processing *...to ask us to limit how we use your data*
- The right to data portability *...to ask us to send your data to you or another provider*
- The right to object *...to complain challenge our use of your data*

In some cases, one or more of these rights may not apply. However, we promise to always consider your rights and respond to you promptly, fairly and within the law.

If you would like to contact us about any of your rights, you can either write to us at the above address or email [data@thinkingthrough.com](mailto:data@thinkingthrough.com). You can find out more about your rights on the [Information Commissioner's Office \(ICO\) website](#).

## How to make a complaint

If you are unhappy about the way we're using your personal data, you can contact us at the above address, or by email at [data@thinkingthrough.com](mailto:data@thinkingthrough.com).

If you are not satisfied with our response or believe we are processing your personal data in a way that is not lawful, you may complain to the Information Commissioner's Office (ICO).

# Company Contact Details

**Directors:** Dr Fiona Warner-Gale and Jane Sedgewick

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S1 4BY

Company number: 7486948  
VAT registration number: 130150967



*ThinkingThrough is a trading arm of Associate Development Solutions Ltd.*