Data Protection Policy

Contact: hr@beyondthephysical.co.uk

Introduction

The protection of individuals via the lawful, legitimate and responsible processing and use of their personal data is a fundamental human right. Individuals may have a varying degree of understanding or concern for the protection of their personal data, but Beyond the Physical must respect their right to have control over their personal data and ensure it acts in full compliance with legislative and regulatory requirements at all times. If individuals feel that they can trust Beyond the Physical as a custodian of their personal data, this will also help Beyond the Physical to fulfil its wider objectives.

The General Data Protection Regulation (GDPR), as supplemented by the Data Protection Act DPA 2018 (DPA), is the main piece of legislation that governs how Beyond the Physical collects and processes personal data. Failure to comply with this legislation may have severe consequences for Beyond the Physical, therefore it is adhered to at all times.

This Privacy Notice sets out how we use and look after the personal information we collect from you. As the organisation that is responsible for, and controls the processing of your personal data, we are the data controller, and sometimes also the data processor, and will take reasonable care to keep your information secure and to prevent any unauthorised access or use of it.

We may update this Privacy Notice from time to time and will inform you to any changes in how we handle your personal data.

1. Information we may collect from you:

Personal data means any information about an individual from which that individual can be identified.

We may collect, use, store and transfer some personal data of our participants and other members. The data we collect from participants may include:

- Name, date of birth and gender.
- Contact information, such as work/home address, email address and telephone numbers.
- We may hold some health data or other special category data of some of our participants or members for the purposes of their health, wellbeing and welfare and, safeguarding.

Where we hold this data, it will be with the explicit consent of the participant.
Where we need to collect personal data to fulfil our responsibilities and a participant fails to provide that data, we may not be able honour or administer their participation in the registered course of learning.

2. How is your personal data collected?

A participant may give us their personal data by filling in digital/paper forms or by corresponding with us by post, phone, email, in person, via our website or otherwise. This will typically be provided by the participant using an online registration form.

3. How Beyond the Physical uses personal data

We will use personal information only for the purposes for which we have been provided with such information.

The reason we need participants' personal data is to be able to administer and manage courses of learning and sharing of best practice. Our lawful basis for processing personal is that we have a contractual obligation to individuals as participants of Beyond the Physical courses.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose / processing activity lawful basis for processing under Article 6 of the GDPR

to respond to your enquiry;	Contractual
to send information to you;	Contractual
to fulfil any contract that we may enter into with you;	Contractual
for research purposes;	Legitimate interest - what is the Beyond the Physical's legitimate interest? Ascertain why you have participated in a learning course with Beyond the Physical. What could be done better in future courses.
to send marketing information to you in accordance with the provisions set out below; or	Consent – we will only send direct marketing if the individual is a, participant or other user of the site and the individual has not previously objected to this marketing, or, has actively provided your consent.
to publish your views or comments on this Site, any other website operated by us or our subsidiaries or in other media.	Legitimate interest – what is the Beyond the Physical's legitimate interest? If a participant and / or member does not want us to do this, they can object to this processing by contacting us via the details in the Contact Us section below.
if you submit your views to us via our contact form we will circulate them internally for training and management purposes	Legitimate interest – what is the Beyond the Physical's legitimate interest? If a participant and / or member does not want us to do this, they can object to this processing by contacting us via the details in the Contact Us section below.
sending out Beyond the Physical's information and updates	Performance of a contract
sharing data with coaches, to run educational courses, training sessions or enter events	Performance of a contract
sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority	Beyond the Physical has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits Beyond the Physical's participants.

Direct Marketing: We would like to send you marketing information, by post, e-mail, or SMS. In addition, selected third parties (including Beyond the Physical Partners as shown on the Site, and other commercial partners) would like to send you marketing information, by post, e-mail, or SMS. We will only do this if you have given your consent to your personal data being used in this way (either when you submit your details to us or at a later stage). You can update your marketing preferences by writing to the Data Protection Officer at the address below.

4. Sharing your personal data

We may share your personal data with our affiliate consultants, suppliers and sub-contractors. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We only permit third parties to process your personal data for specified purposes and in accordance with our instructions.
We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

5. International transfers

Some of our suppliers or third parties may process our personal data outside the European Economic Area (EEA) such as our website and email providers. We review the data protection terms of these suppliers to ensure that your personal data will only be transferred out of the EEA, if sufficient appropriate safeguards are in place.

6. Protection of your personal data

We are committed to protecting your privacy and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the nature of the Internet is such that the data may in some circumstances flow over networks without full security measures and could be accessible to unauthorised persons.

In addition all Beyond the Physical staff should ensure that adequate security measures are in place to limit the risk of personal data breaches. For example:
• Staff should lock their computer screens when they are not in use.
• All personal data collected via a company or personal device for the purposes of providing the Beyond the Physical services, should be processed through the Company's CRM.
• Staff should not disclose their passwords to anyone.

• Email should be used with care. Company staff must ensure that emails are sent only to the intended recipient/s. Where Beyond the Physical staff send an email in error then the email must be recalled immediately and Company staff must inform those listed in the Appendix of the error so that any risk of a personal data breach can be limited.
• Learner information and other personal data should be stored securely to prevent unauthorised access. They should not be removed from their usual place of storage without good reason.

• Learner information should always be locked when not in use and when in use should not be left unattended.

7. Data retention

We keep personal data on our participants, members and other website users while they are signed up to the Beyond the Physical or any of our website services. We will delete this data 24 months' after an individual has ended their membership, or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Cookies

When you visit our website, the website, we may collect, process and use informing about you which may not personally identify you but which may be helpful for improving the operation of he website. Such information may be collected through "traffic data" and may entail the use of "cookies", "IP Addresses" or other numeric codes used to identify your computer. You can delete cookies or configure your computer to reject them, although this may disable the website's ability to manage individual sessions.

9. Third Party Links

This website may contain links to other sites. Please be aware that we are not responsible for the privacy practices of these sites. We encourage our users to be aware when they leave this website and to read the privacy statements applicable on those sites. This privacy policy does not apply to information collected on third parties' sites.

10. Your Rights

All data subjects have the right to:

• Request access to your personal data

• Request rectification of the personal data that we hold about you.

• Request erasure of your personal data where there is no good reason for us continuing to process it.

• Object to processing of your personal data for direct marketing, or where we are processing on the grounds of a legitimate interest of that interest is overridden by your rights and freedoms.

• Request restriction of processing of your personal data while we establish the data's accuracy, or verify an overriding interest to object to processing; where our use of the data has been unlawful but you do not want us to erase it; where you need us to hold the data to establish, exercise or defend legal claims.
• Request the transfer of your personal data to you or to a third party in a structured, commonly used, machine-readable format.
• Withdraw consent at any time where we are relying on consent to process your personal data.
• Complain at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

11. Contact us

If you have any queries about this Privacy Policy, wish to stop direct marketing by Beyond the Physical, its subsidiaries or third parties or you wish to access or update your information please email info@beyondthephysical.co.uk.

8. Data protection policy

Introduction

The protection of individuals through the lawful, legitimate, and responsible processing of their personal data is a fundamental human right. Beyond the Physical is committed to respecting individuals' rights over their personal data and ensuring full compliance with legislative and regulatory requirements at all times. Establishing trust in how Beyond the Physical manages personal data also supports the organisation in fulfilling its wider objectives.

The General Data Protection Regulation (GDPR), supplemented by the **Data Protection Act 2018 (DPA)**, is the primary legislation governing how Beyond the Physical collects and processes personal data. Failure to comply may have severe consequences for Beyond the Physical; therefore, strict adherence to these regulations is essential.

This **Privacy Notice** outlines how we collect, use, and protect personal information. As both a **data controller and data processor**, we are responsible for safeguarding your data and ensuring its secure handling. We may update this notice periodically and will inform individuals of any significant changes.

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1. Information We May Collect from You

Personal data refers to any information that can identify an individual. Beyond the Physical may collect, use, store, and process personal data of participants, employees, and other members, including:

- **Name, date of birth, and gender**
- **Contact information**, such as address, email, and phone number
- **Health and special category data**, where relevant, for safeguarding, wellbeing, and welfare purposes (**explicit consent required**)

If a participant fails to provide necessary data, we may be unable to administer their participation in a course or activity.

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2. How Is Your Personal Data Collected?

Personal data may be provided by participants and employees through digital or paper forms, email, phone, post, in person, or via our website. Typically, this occurs via online registration forms or employment-related documents.

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3. How Beyond the Physical Uses Personal Data

Personal data is used only for its intended purpose. The lawful bases for processing are outlined below:

Purpose/Processing Activity	Lawful Basis (Article 6, UK GDPR)
Responding to enquiries	Contractual obligation

Sending relevant information	Contractual obligation
Fulfilling contractual agreements	Contractual obligation
Conducting research to improve courses	Legitimate interest – Understanding participant experience and improving future offerings
Sending marketing communications	Consent – Only sent if consent is provided
Publishing participant comments/views	Legitimate interest – Showcasing participant feedback (opt-out available)
Using feedback internally for training	Legitimate interest – Improving internal processes (opt-out available)
Sharing data with coaches/trainers	Performance of a contract
Sharing anonymised data with funding bodies	Legitimate interest – Securing funding for participant benefits

Direct Marketing

We may send marketing communications via post, email, or SMS **only if consent has been given**. Third parties (e.g., Beyond the Physical's partners) may also send marketing communications if **explicit consent** has been provided. Preferences can be updated by contacting the **Data Protection Officer**.

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4. Employee Data

Beyond the Physical collects and processes employee data in compliance with UK GDPR and the Data Protection Act 2018. This includes:

Types of Employee Data Collected

- **Personal details** (name, date of birth, contact details)
- **Employment information** (employment history, qualifications, right-to-work documents)
- **Payroll and financial data** (bank details, National Insurance number, tax records)
- **Performance records** (training, disciplinary history, appraisals)
- **Health data** (only when necessary for health & safety, absence management, or safeguarding)

Purpose of Processing Employee Data

- Managing recruitment, employment contracts, payroll, and pensions
- Ensuring compliance with employment laws and safeguarding policies
- Performance monitoring, training, and professional development

Legal Basis for Processing Employee Data

- **Contractual Obligation** – To fulfill employment contracts
- **Legal Obligation** – Compliance with tax, right-to-work, and safeguarding laws
- **Legitimate Interest** – Workforce management and security
- **Consent** – Where required (e.g., optional health screenings)

Retention Period for Employee Data

- Employment records: **6 years after leaving** (for legal claims)
- Payroll/tax records: **6 years minimum** (for HMRC compliance)
- Safeguarding records: **up to 25 years** (depending on legal requirements)

Employee Rights & Data Security

- Employees have the right to access, correct, and erase data where applicable.
- Security measures include password protection, restricted HR access, and encrypted payroll data.

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5. Sharing Your Personal Data

Beyond the Physical may share personal data with affiliated consultants, suppliers, and subcontractors. All third parties are required to handle data securely and in compliance with the law. Data may also be disclosed when legally required or necessary for safeguarding.

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6. International Transfers

Some personal data may be processed outside the **European Economic Area (EEA)**, such as by website and email providers. Where data is transferred internationally, **appropriate safeguards** (e.g., UK International Data Transfer Agreement or EU Standard Contractual Clauses) will be in place to ensure compliance.

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7. Data Protection & Security

We take data security seriously and implement measures to prevent unauthorized access or breaches. These include:

- **Locking computer screens when unattended**
- **Using a secure CRM system for data processing**
- **Avoiding password sharing**
- **Sending emails with care (recall if sent in error)**
- **Storing personal data securely and limiting access**

Data Breach Response:
If a data breach occurs, Beyond the Physical will assess the risk and report to the **ICO (Information Commissioner's Office) within 72 hours**, if required.

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8. Data Retention

Personal data is retained while individuals are engaged with Beyond the Physical's services. Data is deleted **24 months after disengagement**, unless a legal obligation requires longer retention. Certain types of data, such as **safeguarding records**, may be retained for a longer period as required by law.

Anonymised data may be used indefinitely for research and statistical purposes.

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9. Cookies

When visiting our website, non-personal information may be collected via cookies or IP addresses. These help improve website functionality. Users can delete or block cookies via their browser settings.

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10. Third-Party Links

Our website may contain links to third-party sites. Beyond the Physical is not responsible for the privacy practices of these sites. Users are encouraged to review third-party privacy policies.

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11. Your Rights

Under **UK GDPR**, you have the right to:

- **Request access** to your personal data
- **Request rectification** of inaccurate data
- **Request erasure** of data if there is no valid reason for processing
- **Object to processing** for marketing or where legitimate interests do not override your rights
- **Request restriction** of processing in certain circumstances
- **Request transfer** of your data in a machine-readable format
- **Withdraw consent** at any time
- **Lodge a complaint** with the ICO (**www.ico.org.uk**)

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12. Contact Us

For any queries, updates, or to opt out of marketing communications, contact: info@beyondthephysical.co.uk