

## ICE Privacy Notice

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This privacy notice is issued on behalf of International Coaching Limited (“ICE”, “we”, “us” or “our”).

We are committed to protecting the privacy and maintaining the security of any personal information that we hold about you. If our privacy notice changes, we will place an updated version on our website.

Please check this privacy notice regularly. Subject to applicable law, all changes will take effect as soon as we publish the updated privacy notice.

### Purpose of this notice

The purpose of this notice is to explain to you what personal information we collect and how we may use it. This notice applies to you if you:

- are a student on an ICE course (or if you enquire/start the booking process but do not attend a course);
- are a parent or guardian of one of our students;
- are a trainer on an ICE course;
- represent one of our suppliers (either as an employee, officer, principal, director or holder of a power of attorney); and/or
- visit our website or otherwise communicate with us.

We are the controller of any personal information which you provide to us, or is provided to us on your behalf, and for which we decide the purposes and means of the processing of that personal information.

This privacy notice should be read together with any other privacy notice or fair processing notice we may provide on specific occasions. This privacy notice supplements such other notices and is not intended to supersede them unless otherwise specified.

### The information we collect

Personal data, or personal information, means any information that relates to an identified or identifiable individual. It does not include data which has been anonymised.

We may collect, use, store and transfer different kinds of personal data about you depending on our relationship with you including:

- **Identity Data** includes first name, last name, username or similar identifier, title, age, date of birth, gender, passport or ID number and copies of your ID.
- **Contact Data** includes email address, postal address, telephone numbers, social media handles
- **Financial Data** includes, payment details, bank account number and sort code.

- **Technical Data** includes your internet protocol (IP) address, cookie information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other information relating to the devices you use to access our services and the technology on those devices, and how you use our website.
- **Student Data** includes information about relevant medical data and any special, dietary, religious or disability requests, and the students insurance company, their agents and medical staff who may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on the students behalf or in the interest of other students or in an emergency, and information generally relating to your attendance on our courses such as photos and skiing videos.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, testimonials and your communication preferences

If you are a student on one of our courses we will collect, Identity Data, Contact Data, Technical Data, Student Data and Marketing and Communications Data.

If you start the booking process but do not attend a course, we will collect Identity Data, Contact Data, Technica Data and Marketing and Communications Data.

If you are a parent or guardian of one of our students, we will collect Identity Data, Contact Data, Financial Data, Technical Data, and Marketing and Communications Data.

If you are a trainer on an ICE course, we will collect Identity Data, Contact Data, Financial Data, and Technical Data.

If you represent one of our suppliers (either as an employee, officer, principal, director or holder of a power of attorney), we will collect Identity Data, Contact Data, Technical Data, and Marketing and Communications Data

If you otherwise communicate with us, we will collect Contact Data and the communications you send to us.

#### How we obtain and store your information

We use collect data from and about you in different ways including through:

- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone, e-mail, social media or otherwise. This includes personal data you provide when you: - apply for or attend an ICE course; - interact with us during the course of your relationship with us; - request marketing to be sent to you; - enter a competition, promotion or survey; - engage with us on social media; - give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties.** We may receive personal data about you from various third parties: - from the ICE trainers who run ICE courses; from other students who attend an ICE course; - from your insurance companies in certain circumstances or emergencies; - from BASI or related skiing organisations; - from payment and delivery services; - from our accommodation providers.

### How we process your personal data

We will only process your personal information when the law allows us to do so. Although in limited circumstances we may process your information because you have specifically consented to it, we generally process your information in the ways set out in this privacy notice because:

- we need to perform a contract we have entered into with you or the service provider you represent.
- we need to comply with a legal or regulatory obligation.
- it is necessary for our legitimate interests (or those of a third party) and your interests and rights do not override those interests.

The legal basis for our processing of personal information will depend on why we process your information. If you are an individual, where you wish to enter into or have signed a contract to receive services from, or provide services to, us, we will process your personal information to enable us to enter into and perform our contract with you. If you do not provide us with your personal information, we may not be able to carry out our contract with you.

We also have a legitimate interest to process your personal information for:

- performing the services or supplying the information you have agreed to receive from us;
- ongoing management of our relationship with you and to maintain contact with you;
- our internal business purposes which may include business and disaster recovery, document retention/storage, IT service continuity (e.g. back-ups) to ensure the quality of the services we provide to you;
- corporate transactions (for instance sharing data with potential buyers and professional advisers in the context of the possible sale or restructuring of our business, or data being shared with us in relation to our acquisition of another business which originally held your information);
- marketing analytics including marketing campaign optimisation and web analytics to enable us to develop and target the marketing of our products and services;
- keeping our records updated;
- answering your queries or addressing any complaints or claims.

We will contact you if we need to engage in any use or processing of your data that requires your consent in compliance with applicable data protection laws.

### Marketing

You will receive communications from us if you have requested information from us or attended an ICE course in the past or if you provided us with your details when you entered a competition or registered for a promotion or provided your contact details to one of our employees in a business context and, in each case, you have not opted out of receiving that marketing.

We send you marketing in these circumstances based on our legitimate interests in marketing our products and services. You may also receive marketing from us if you have specifically consented to receiving that marketing, especially if you are an individual and aren't an existing customer of ours. You always have the right to "opt out" of receiving our marketing by contacting us. If you "opt-out" of our marketing materials we may still need to contact you for administrative or operational purposes.

### Sharing of your information

We may share your personal information with selected third parties including:

- service providers of ICE for the purposes of running the ICE courses e.g. our accommodation providers;
- our payment provider;
- trainers, business partners, other students, and BASI if you are a student attending an ICE course which includes a BASI qualification;
- students, BASI and business partners if you are a trainer on an ICE course;
- analytics and search engine providers that assist us in the improvement and optimisation of our website.

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions which can be found on our website, or in order to enforce or protect any of our rights or property. [Where we store your personal data](#)

The data that we collect from you will be stored in the United Kingdom. It will be processed by staff operating inside the European Economic Area ("EEA) who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your contract, the processing of your payment details and the provision of support services. We will ensure a similar degree of protection is afforded to it in both the UK and the EEA.

### Data security

We 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. In

addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### How long we store your personal data

Unless you request otherwise:

We will retain your personal data for no longer than 10 years. In some circumstances, it may be necessary to keep your information for longer than this period, in order to fulfil the purposes we collected it for, or for the purposes of satisfying any legal or accounting requirements.

#### Your rights

Data protection law gives you a number of rights when it comes to personal information we hold about you. The key rights are set out below. Under certain circumstances, by law you have the right to:

- **Request access to your personal information (commonly known as a “data subject access request”).** This enables you to receive a copy of the personal information we hold about you and to check we are lawfully processing it.
- **Request correction of the personal information that we hold about you.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure of your personal information.** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing of your personal information** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing of your personal information.** This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal information to another party.**

- **Withdraw your consent to the processing of your personal information** at any time. Provided we are processing your data with consent as the lawful basis. If not, this right does not apply to that personal information.

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. Their contact details are: Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Tel: +44 303 123 1113.

Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we will let you know.

#### Contact details

Questions, comments and requests regarding this privacy notice should be addressed to:

International Coaching Limited  
7 Stamford Square  
Ashton-Under-Lyne  
Lancashire  
OL6 6QU