

Privacy Policy

lighthouse partnering

Handling your personal data with respect and care is most important to us at Lighthouse Partnering. To this end, this privacy policy (Privacy Policy) gives you an overview of how we process your personal data.

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1 Who we are

<u>Lighthouse Partnering</u> is a limited liability company (LHP) registered at:

Heusser-Staub-Strasse 30 8610 Uster Switzerland

If you require further information or have any questions or comments about our Privacy Policy, please feel free to contact us via email at john.koch@lhpartnering.com.

2 The personal data we collect:

2.1 Your Identification and Health Data

We use a variety of personal information depending on services we provide. In each case we need to use your basic identification data:

- Full name
- Contact details: Email and mobile No.

Depending on the context and nature of our services, we may also need:

- Your birth date
- Your marital status
- Your general professional data: Your organisation, title, role, URL etc.
- Your contact address in case we need to send you any documents



Depending on your health situation, we might also need health-relevant information to support you in your health and/or in referring you to other professionals.

2.2 Your Contextual Data for Services We Provide

We also use information, your contextual data, that relate to you in one way or the other in connection to our services. These may be recorded in:

- Official contractual and commercial documents: Including emails, orders, agreements and/or guidelines, coaching plan, invoices, official third-party reports (cf. Pt. 4.1.2) etc.
- Execution documents: Emails, process documents such as session preparation forms or our inhouse assessments such as the Cross-Cultural Values Assessment, or your bank details for issuing a refund etc.
- Session evaluation and written feedback: Audio recordings and transcripts, processed only with prior consent of all parties involved, and feedback reports.
- Personal notes: As applicable, personal notes and self-reflections for e.g.: Coaching or supervision etc.
- Personal logbooks: Personal logs documenting the professional progression of our staff.
 These logs contain your name, email with mandate specific logged hours and duration of engagement.

3 How we collect your data

We obtain your personal information directly from you, for example when you:

- Contact us via our webpage or communicate with us verbally, via email or by any other means.
- Contract any of our services, submit an enquiry or file a complaint.
- Voluntarily take part in a customer survey or provide us feedback in any way.
- Use our website via your browser's cookies.
- Schedule a meeting via our scheduling page.

Or, as part of our services, we may also obtain your information from:

- Your reflection and learning process.
- From session evaluations, interviews, job appraisals or feedbacks.
- From sponsors, stakeholders or peers.

4 What we use your personal data for

4.1 Performance of contracts

As part of completing a contract with you or with others in a multi-party contract setup, we provide you with services for which we need to know your identification and contextual data (cf.

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Pts. 2.1 and 2.2). The personal information you or third parties (cf. pt. 4.1.2) relate to us are bound to confidentiality in accordance with our <u>General Terms and Conditions (GTCs)</u>.

On this basis, we will process your data as follows:

4.1.1 Reporting in multi-party contract setups

As applicable, we submit your personal data that are limited to the formal execution of a contract without breaching our confidentiality obligations as part of our reporting requirements towards sponsors and/or key stakeholders. Such data may include, e.g.: Agreements or extracts of personal logs (cf. pt. 2.2). This does not include your content-related contextual data, that is bound to confidentiality.

4.1.2 Contracting of specific services from specialised third-party providers:

As applicable and as contracted with you, we share personal data for specific services from specialised third-party providers for e.g., a personality type assessment or a 360° feedback.

4.1.3 Professional Development, Credentialing and Accreditation

In our pursuit of service excellence in accordance with the regulations of official professional bodies, such as e.g. The International Coaching Federation (ICF) or the European Mentoring and Coaching Council (EMCC), we process and share as required:

- Specific topics or situations from a session or meeting in an anonymous or hypothetical form
- Specific audio recordings and transcripts, as explicitly agreed to in advance with all parties involved
- Extracts from staffs' personal logbooks

We share this information with other professionals or official professional bodies and/or training institutions according to their official privacy policies for the professional development of our staff in the following areas:

- Continued reflective practice in supervision and/or mentoring coaching
- Continued training and education
- Obtaining and maintaining of credentials or accreditations

4.2 Marketing

We would like to communicate with you via email for topics or offers you have expressed interest in, such as services or newsletters. If you have agreed to receive such communication, you may always opt out at a later date. In this case, please let us know via email.

4.3 Cookies

Some internet pages use so-called cookies. Cookies do not cause any damage to your computer and do not contain viruses. Cookies serve to make our offer more user-friendly, effective and secure. Cookies are small text files that your browser saves that are stored on your computer.



Most of the cookies we use are session cookies. They are automatically deleted at the end of your visit. Other cookies remain stored on your device until you delete them. These cookies enable us to recognise your browser on your next visit.

You can set your browser to be informed about the setting of cookies and only allow cookies in individual cases, exclude the acceptance of cookies for certain cases or in general activate the automatic deletion of cookies when closing the browser. If you deactivate cookies, the functionality of this website may be limited.

Cookies that are required to carry out an electronic communication process or to provide certain functions you have requested (e.g. shopping cart function) are stored on the basis of applicable data protection regulations. The website operator has a legitimate interest in storing cookies to optimise their services and avoid technical errors.

5 Our legal basis for using your personal data

We only use your personal information where that is permitted by the laws that protect your privacy rights. Accordingly, we only use personal information that:

- We need to use to perform a contract with you
- We need to use to comply with our legal obligations
- We need to be compliant with professional bodies such as the ICF or EMCC
- We have your consent in matters as specifically prompted by us and where consent is needed
- Is fair to use either in our interests or someone else's interests, where there is no disadvantage to you; for example, notifying you of an event being organised by a professional body or other person of interest, or the sharing of resources.

6 How long we store your data

We securely store your personal data according to Pt. 2 for the following duration of:

- Your personal identification data: Up to 10 years from the last communication via email.
- Staff's personal log: These are stored permanently.
- Official contractual and commercial data: For 10 years from completing or terminating the contract as legally required by Swiss law.
- Contract execution data: For 10 years from completing or terminating the contract.
- Personal notes and reflections: Until completion or termination of the contract.
- Audio recordings, transcripts and feedback reports:
 - o For Mentor Coaching of ICF Portfolio Path credentialling: Until award of credential.
 - o For ICF Portfolio assessments: Six months after first submittal of ICF feedback report.
 - o For all other activities: Until completion or termination of contract.



After expiry of the above retention periods, the relevant data will either be physically destroyed or permanently deleted from the respective storage sources by the end of the following June.

7 Your data protection rights

Your data privacy rights are as outlined below. We will not charge for processing any of your request to exercise your privacy rights, and we will respond to your requests in accordance to our obligations under applicable data protection law. Please contact us for any of these matters by emailing to john.koch@lhpartnering.com.

7.1 Your right of access

You can request access to a copy of your personal information that we hold.

7.2 Accuracy

You can request us to correct or delete inaccurate or incomplete personal data.

7.3 Your right for erasure

You can ask us to delete your personal information if they are no longer required, you have withdrawn your consent where consent is required, or where we have no lawful basis for keeping it.

7.4 Right to restrict processing

You have the right to request that we restrict the processing of your personal data.

7.5 Data portability

You have the right to request that we transfer the data that we have collected to a third-party designated by you or directly to you.

7.6 Your right to object

You can object to us processing your personal data.

7.7 Right to filing a complaint

Should you believe that our processing of your personal data is in anyway unlawful, you retain the right to file a complaint with a supervisory authority. Before doing so, we would invite you to contact us with your concerns, as we will always endeavour with utmost priority to find solutions with you. As LHP is registered in Switzerland and operating under Swiss law, complaints are to be filed with the:

Federal Data Protection- and Public Commissioner (EDÖB)

Feldeggweg 1 3003 Bern

https://www.reklamationszentrale.ch/2018/03/08/adressen-und-kontakte-von-beschwerdestellen-im-bereich-datenschutz-und-kommunikation/

Phone advice service: +41(0) 31 322 43 95 (Mon to Fri between 10:00 bis 12:00 h)