

Open Blend Method – Privacy Policy

Introduction

This is the Privacy policy for the Open Blend Method platform, (the "Service") provided through app.openblendmethod.co.uk (the "Site"). The Site and the Service are provided by Open Blend Method Limited, ("Open Blend Method", "we", "us" and "our").

We understand that the privacy and confidentiality of your personal information you provide and that we handle is important to you. Open Blend Method are committed to protecting and respecting your privacy. Here we explain what personal information we collect, how it is used, shared and stored and how you can exercise choices and manage your information.

By visiting and engaging with our Service you acknowledge that you have read and understood the practices in relation to the use and disclosure of your personal information described in this privacy policy. Please select from the different sections of this privacy policy to learn about the information collected by us and how it is used.

We may amend or update this privacy policy from time to time, by changing the privacy policy on the Site and/or by notifying you when you return to the Site, or by email. Any amendments will take effect [30] days after they are published.

Information we collect and how we will use it

We only collect information that is needed and relevant to providing and improving the Service. Where you are an employee, we collect information from your employer in order that we can authenticate your initial access to the Service as well as information we collect from you when you sign-in, register with and use the Service. When we collect information we will seek to indicate where collection of your information is voluntary or mandatory for the effective operation of the Service.

We collect the following personal information about you:

Employer supplied information

We collect your name, email address, gender and manager name from your employer to ensure we correctly identify and authenticate you when you first access the Service.

Verification and registration information

This includes:

- your name and, email address and password that we use to recognise you and authenticate your sign-in as part of the subscription to the Service in addition to your age.

Self-assessment and your 'Blend' information

We collect information using a questionnaire covering a range of factors to help you create your profile, understand what is important to you, to help you prepare for your conversation ("Session") with your manager and to help your manager understand your key drivers .

This includes:

- about your life at work, including your role, how long you have been with your employer and in your current job, your commute and working week, your contracted and actual hours worked and a general indicator of your salary bracket;

- about your life outside work, such as life events or commitments that you see as having a bearing on your working life, including childcare support; and
 - information about how you feel about your life and experiences, wellbeing, work and career at that point in time; and
 - about the chosen combination of elements relevant to your life at work or outside work that are important to you and that you wish to discuss with your manager (your "Blend")
- The Service enables you to set goals against the different elements of your Blend and to generate information to help you and your manager discuss and understand your progress.

Session information

This includes calendar appointments for scheduled sessions and information from the outcome of the Session between you and your manager and which may include a short note of any key points arising from the conversation, performance against goals and agreed actions or objectives.

We use this information under the subscription to the Service and in the context of our legitimate interest in delivering the service to your employer and to you.

You choose what level of information you share through the platform with your manager about life outside your work, and how you feel, but if you do not submit certain information you may not get the full benefit of the Service.

Queries or comments

We may collect personal information if we receive a question or comment about the Service and will use this information for our legitimate purpose of responding to that question or comment.

Information collected from your use of the Service

We collect certain automatic information when you use the Service. This includes:

- *Device information*

When you access our Service we collect certain technical information about your computer or device, your Internet Protocol ("IP") address, browser type and operating system. We use this information as part of our legitimate interest in processing your information, to authenticate your access and to recognise you when you access the site. This information also helps us, in our legitimate interest, to optimise the Site and Services to your device.

- *Log and activity information*

Information from your use of the Service. This includes when you sign-in, schedule or join a Session, and when you attend or miss a session. It also includes a record of session actions.

This information is used to update your account and helps us understand how often and how long you interact with the Service. We also use this information to update you, to update the Service and to provide aggregate reports on the overall use of the Service to your employer.

If log and activity information suggest that you or your manager may be experiencing problems accessing or using the service, we may contact your employer's designated

Project Engagement Lead ("PEL") who may contact you direct to see if you need help with the Service. For more information about sharing information with the PEL see 'When we share information' below.

- *Cookies, tracking tools and how we use them*

We use cookies or similar technologies (collectively described here as 'cookies') to collect information about your access to and use of the Service. This information is used to help us to understand when and how the Service and its different features are used and to effectively deliver and improve our Service.

Cookies are small pieces of information which are issued to your computer or device when you visit the Site and which store and sometimes track information about your use of the Service.

We use cookies that are essential to the Service that enable our sign-in process and allow you to move smoothly around the Site and interact with the Service.

We also use analytic cookies that collect information about how you use the Service, provide us with aggregate statistics about the number of unique interactions there are with the Site and on overall patterns of usage and help us to understand how we can make improvements. We use Google Analytics to collect and provide this information by reference to a cookie id and IP of your device and the log information about the use of the Site to measure those activity levels. This information may be transmitted to and stored on the servers of Google. You can opt-out from the collection of this information to Google by downloading and installing a browser plug-in at <https://tools.google.com/dlpage/gaoptout>

We or our service providers acting on our behalf, may also include tracking pixels (which are small image files) in our emails to help us understand whether you open or engage with our communications as well as more generally, in providing us with metrics on the deliverability of our communications.

Most computers and some mobile devices will automatically accept cookies, but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies by visiting www.allaboutcookies.org which includes useful information on cookies and how to block cookies using different types of browser. Please note however, that by blocking or deleting cookies you may not be able to take full advantage of the Site or Service.

Personal information provided by you and through the use of the Site and the Service is used by Open Blend Method for the purposes of research including profiling and on the basis that the outputs of this processing do not include any data which can be used to identify you or another individual. Such research is used by Open Blend Method in articles, whitepapers and other publications related to productivity, engagement and retention of talent within business generally. It may also be used to describe the Open Blend Model to prospective partners or in advertising our Service, but again, without identifying individuals or employers.

When we share your information

There are certain situations where we will share certain personal information in the context of operating and providing the Service under the subscription.

In particular certain personal information may be shared with or accessible to:

- Your manager –Your manager can access your profile summary at the time of your first session and afterwards via their password protected log-in to the Site so that they can

prepare for the Session with you, sign off on agreed actions or add actions or objectives where appropriate following the Session. In addition, when you and your manager sign-in to a Session, you will both view during the Session, the Blend you have put together from your self-assessment and which includes the core elements you have chosen to include for discussion. This information is only shared by you with the Manager during the Session.

- Your employers authorised Project Engagement Lead - your employer will have authorised a specific individual within the organisation designated to act as the Project Engagement Lead ("PEL") or single point of contact for support and technical matters and questions arising from the operation of the Service. The PEL at your employer may have access to information for example about problems you or your manager may have with accessing or using the Service for the purpose of contacting you and providing any help that may be needed. You can also contact the nominated PEL for your employer if you have any questions regarding the Site or the Service.
- Your employer - we provide aggregate information and reports to your employer about the overall use of the Service and on trends related to Blend elements and about progress across the company against goals and objectives. You cannot be identified from these reports.
- Service providers – We work with third party service providers who assist us in supporting the Services, including hosting companies. We may also share your information with other companies who assist us with other functions including technical support and development, research and in supporting the delivery of our communications through the Service. Where we use third party service providers to provide services for us, those providers must only use information where necessary to support the services for us.
- Legal - outside the normal course of operating the Services we may also share information where required or entitled by law, legal regulatory process, for the purposes of obtaining legal advice, to prevent fraud or cybercrime or other threats to the Site or Services.
- Business or process change partners – In the event that we or any part of our business undergo a re-organisation or are sold, personal information we hold may be transferred to that re-organised entity and this privacy policy will apply to the personal information that is transferred to that entity or third party.

When we may communicate with you

We will only contact you through the Service to confirm a booked Session appointment made through the Service, to send reminder notes, including to remind you of a booked session or notify you of a missed Session. Following a session we will email details of actions or objectives agreed with your manager. Details of agreed actions are sent only to you and not to your manager. To assist managers in developing their coaching skills, we may forward training content including links to podcasts and videos.

Open Blend Method does not use your personal information to communicate with you for marketing or promotional purposes.

Overseas Transfers of personal information

The personal information you provide through the Site is hosted and stored on servers in the United Kingdom and Europe.

We may transfer personal information that we collect to selected service providers who perform functions on our behalf based in countries outside the European Economic Area ("EEA"). Where we transfer personal information in this way, we will take steps to implement appropriate legal mechanisms relevant to the transfer such as a valid Privacy Shield certification (in the case of a data transfer to a Privacy Shield certified US recipient - <https://www.privacyshield.gov/welcome>) or enter into appropriate EC approved standard contractual clauses relevant to personal data transfers between data controllers or between a data controller and a data processor, (see http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm).

In addition if you access or use our Services from outside the EEA, we will need to transfer your information to you in order to provide you with the Service.

Security and storage

We have implemented appropriate technical and organisational measures to safeguard personal information against unauthorised or accidental access, processing, modification or disclosure. We use Microsoft Azure Data Centres. Each facility is designed to run 24x7 and employs various measures to protect operations from power failure, physical intrusion and network outages and employing industry standards for physical security and reliability.

Information submitted by you is encrypted in transit using industry standard Secure Sockets Layer (SSL) with 256 bit AES encryption.

Remember that it is important that you keep your password for accessing and using the Service secret at all times.

Your personal information will be retained by us for the duration of your active account with the Service and may be retained for a period after this time as necessary and relevant to our legitimate operations, our terms with your employer and in accordance with applicable law obligations. This may include retention necessary to meet to identify, issue or resolve legal proceedings. We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our Services. You cannot be identified from aggregate information retained or used for these purposes.

Your access, rights and choices.

You have options and choices over how we use your information. Open Blend Method allows you update your profile and Blend information relating to your use of the Services at any time through your account. You can also access details of your past Blends and track your progress.

We also respect the rights you may have under applicable law to request access to your personal information and where applicable, to request to receive that information in a commonly used electronic format, (or ask for this information to be provided in that format to another service provider where feasible). You may also have the right under applicable law to request the correction or erasure of your personal information, to seek to object to the further processing under certain circumstances of your information or to request that the processing of specific information about you is restricted while we verify or investigate your concerns about this information.

If you remain unhappy with a response you receive, you can also refer the matter to your data protection supervisory authority (see http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

Contacting us

If you have any questions or queries about this privacy policy you can contact us

By email at hello@openblendmethod.co.uk

By telephone at 01628 918750

Or by post to 6 Roman Lea, Cookham, SL6 9BZ

You can also contact our data protection officer at anna@openblendmethod.co.uk