

1. Our policy

When you deal with The Game Changer Company, you trust us with your information. We take privacy and security seriously and we are committed to protecting the data you provide to us.

This policy explains when and why we collect personal information about our customers, how this information is used and processed, the conditions under which it may be disclosed to others, and how it is kept secure.

This policy may change from time to time so please re-visit this page occasionally to ensure that you're happy with any changes.

2. The Game Changer Company

The Game Changer Company is a trading name of The Game Changer Company.

The Game Changer Company, a limited company, is the data controller in relation to the processing activities described below. This means that The Game Changer Company decides why and how your personal information is processed.

Where this policy refers to "we", "our" or "us" below, unless it mentions otherwise, it's referring to the company that is the controller of your personal information.

3. Collection of Your personal information

We may collect and process the following information about you in the following ways.

a. Information that you give to us

This is information about you that you give us when you make an enquiry of, or engage us to provide services to you, or by entering information via our website, opt-in/consent forms, apps or by communicating with us by phone, post, e-mail, live chat, social media or otherwise.

The information you give us mainly includes your contact details, identification information, financial or billing information, biographical, employment, and details included in any correspondence and information about you in connection with any matter on which we deliver services to you.

You can link your social media or other third-party account to the The Game Changer Company single sign-on solution. By linking the services, you authorize us to collect, store and use any information they may give us (e.g., your email address, first name, last name, profile picture) for the purpose of provisioning and/or allowing access to your account and account related services. You can disconnect your The Game Changer Company account from third-party accounts through your settings on the account you have with the third-party (e.g. Google) at any time.

b. Service data you generate when we are providing our services to you

We may automatically collect service data about you which we may observe, detect or create without directly asking you to provide the information to us. The information you give us mainly includes performance metrics related to the job role that you are performing in each service and this information forms the key basis for your individual service report generated at the end of most of our services.

c. Information we receive from other sources

We may receive information about you from third parties. These may include:

- Your entrusted third-party who has engaged us to provide services for you or has subscribed to the The Game Changer Company platform for you
- Entrusted employers who may provide a reference on you to us
- Entrusted consultants who may provide information about you to us

We may supplement the personal data collected from you with information from publicly available sources, such as information to validate your identity or address, or to perform a credit check.

d. Information we collect about you

We may automatically collect information about you which we may observe, detect or create without directly asking you to provide the information to us. In common with most other businesses, this will mainly include information gathered automatically through your use of our website or online services, such as your IP address, the pages of our website that you have visited.

4. Processing of your personal information

As a firm dealing with corporate services, we may process a range of personal information about you. To make it easier to understand the information that we use about you, we have divided this information into categories in the table below and provided a short explanation of the type of information each category covers:

<u>Category</u>	<u>Personal information included in this category</u>
Banking/billing	Information used to send/receive funds to/from you or that appears on your bills.
Behavioural	Your activities, actions and behaviours on our sites.
User Profile Information	Personal information, e.g. graduation year, preferred employment location, level / subject of study, for The Game Changer Company to more accurately recommend to you job opportunities with our partners.
User Profile Information	Personal information, e.g. hiring year, employment location, sector of employment, for The Game Changer Company to more accurately recommend to you learning and trainings with our partner institutions.
Cardholder	Your payment card details.

Contact	Information which can be used to address, send or otherwise communicate a message to you.
Correspondence	Information contained in our correspondence or other communications with you or about you, about our products, services or business.
Engagement	Data related to your level of engagement with our content and Platforms. E.g. the number of services you have completed or the number/amount of learnings you have consumed.
Employment	Your previous, current or future employment details.
Geo-location	Information which contains or reveals the location of your electronic device.
Monitoring	We may record phone calls and retain transcripts of dialogue i.e. live chat conversations, either for our records or for training purposes. If you visit one of our offices your image may be recorded on CCTV for security purposes.
Services performance	Data measuring your level of service performance using our own bespoke and third-party metrics.

5. Use of your personal information

We may use the information we collect about you in the following ways.

a. Where it is necessary for us to perform a CONTRACT with you

We may use and process your personal information where we have supplied you (or continue to supply you) with any services, where we have arranged for the supply of another firm's services to you, or where you are in discussions with us about a service on which you are considering using.

We will use your information in connection with the contract for the provision of services when it is needed to carry out that contract or for you to enter it.

We may also use and process your personal information in connection with our recruitment activities, if you apply for a position with us (whether directly or through a third party) or send your details to us on a speculative basis.

b. Where you have provided CONSENT

We may use and process your personal information where you have consented for us to do so via our opt-in consent process for the following purposes:

- to send direct marketing information to you which includes information about our products and services, news, event and seminar invitations and financial updates.
- to send you editorial newsletters and information created by The Game Changer Company and its brands.
- to refer you for potential further services with our third-party partners when you have performed strongly in one of our services; and
- To provide participation and performance feedback to your employer or any other third party, e.g. in the event where this third party has paid The Game Changer Company for you to have access to an The Game Changer Company platform, in order for this third party to carry out internal analytics and record keeping and to help them tailor the services that they provide directly to you.

We will seek separate and specific consent from you in circumstances where we wish to feature your identity in a published case study, press release, advertisement or testimonial or wish to include your image in a photograph or video in connection with public relations or promotional activities.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see 'Withdrawing your consent' for further details.

c. Where required by LAW

We may use and process your personal information in order to comply with a legal obligation as follows:

- to maintain a register of corporate gifts and hospitality to comply with anti-bribery laws;
- to maintain a record of undertakings where you are a beneficiary of an undertaking; and
- to comply with our legal and regulatory obligations.

d. Where we have a LEGITIMATE INTEREST

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes.

- to carry out our conflict checks to ensure that we can provide services to you; and
- for prevention of fraud and other criminal activities.
- to verify the accuracy of data that we hold about you and create a better understanding of you as a user.
- analysis to inform our business and marketing strategy.
- to manage and deliver internal projects for business improvement.
- monitoring and management of performance standards within the business.
- to assess and improve our service to clients through recordings of any calls and live chat sessions.
- network and information security in order for us to take steps to protect your personal information against loss or damage, theft or unauthorised access.

- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists to be able to comply with your request); and
- in the management of queries, complaints, or claims.

6. Who may receive or have access to your personal information

a. Our suppliers and service providers

Our work for you may require us to provide information to third parties who will use your information for the purposes of providing services to us or directly to you on our behalf.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service, and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Third party service providers may send direct marketing information to you regarding your business, which includes information about our products and services, news, event and seminar invitations and financial updates.

b. Credit/debit card payment processors

All payment information is handled using encrypted technology and our third-party payment provider are compliant with the Payment Card Industry Data Security Standards. Where you make payment to us by credit or debit card, we will use the payment card information only for the purpose of processing that specific transaction.

No credit or debit card details are stored by The Game Changer Company once your payment has been processed and the transaction is completed.

When you pay for any services over the telephone/internet, your credit/debit card payment is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us using the details at the end of this policy.

c. Other ways we may share your personal information

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers.

However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

7. Storage of your personal information

All information you provide to us for our use is stored on our secure servers which are located within the UK, the European Economic Area and the GCC.

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA (for example, if our hosting services provider changes) we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law. This is because some countries outside of the EEA do not have adequate data protection laws equivalent to those in the UK or the GCC.

8. Duration of storage of your personal information

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.

We do not retain personal information in an identifiable format for longer than is necessary.

We mainly need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for up to 7 years after the date it is no longer needed by us (retention times vary for different types of data) for any other purposes listed under 'How we use your personal information'.

The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period, or delete it sooner:
or
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further 'Erasing your personal information or restricting its processing').

9. Your rights

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received this information or, where no action is required, after we have received your request.

a. Accessing your personal information

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

b. Correcting and updating your personal information

The accuracy of your information is important to us.

If you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, either correct it yourself by editing your profile on our web site(s), or please let us know by contacting us using any of the methods described at the end of this policy.

c. Withdrawing your consent

Where we rely on your consent as the legal basis for processing your personal information and service data, as set out under 'How we use your personal information', you may withdraw your consent at any time by emailing contact@thegamechangercompany.io

If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our Unsubscribe tool at the footer of any unwanted direct marketing received. If you withdraw your consent, our use of your personal information before you withdraw your consent is still lawful.

d. Objecting to our use of your personal information made about you

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as set out under Clause 5: How we use your personal information, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information; we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our Unsubscribe tools.

You may also contest a decision made about you based on automated processing by emailing contact@thegamechangercompany.io

e. Erasing your personal information or restricting its processing

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. We may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

f. Transferring your personal information in a structured data file

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under Clause 5: How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file or other applicable format.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

g. Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details.

10. Security/cookies/links

a. Security measures we put in place to protect your personal information

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our website and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

We do not collect any Special Categories of Personal Data.

Where we have given (or where you have chosen) a password which enables you to access any of our online or electronic resources, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

b. Use of 'cookies'

Like many other websites, our websites use cookies (including Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes to our Website). 'Cookies' are small pieces of information sent to your devices and stored in its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences.

c. Links to other websites

Our website may contain links to other websites run by other organisations. This policy does not apply to those other websites and Apps, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites and Apps even if you access them using links that we provide, and their security cannot be guaranteed

In addition, if you linked to our website from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

11. Marketing

You will only receive direct marketing information from The Game Changer Company if you indicate to us a preference ("opt-in") to do so. You will be invited to complete a client consent/opt-in process by email or tick box as a result of any of the following:

- your becoming a client of The Game Changer Company;
 - your attendance at an event or seminar hosted, or co-hosted, by or with The Game Changer Company;
 - you providing a business card directly to an employee of The Game Changer Company at (for example) a trade or networking/business event;
 - you registering your brief contact details in order to obtain information or free downloads from an The Game Changer Company website;
 - an email request from you to attend an event we have advertised via social media or on our website or via a third party;
 - your attendance at a 'public' event organised or co-hosted by The Game Changer Company that has been promoted via social media or other advertisements;
 - we may contact you in response to an article or social media promotion that you have carried out;
- a. We will never share your data with third-party partners for their own marketing uses, though we may use service providers to assist us with our own marketing. This could include sharing your information as per Clause 6a to provide a service to us.
 - b. We do not rely on your consent indefinitely. You will receive an email from us periodically, where you will be asked to re-confirm your consent and preferences for financial topics and disciplines to ensure the data we hold about your preferences, and your contact details, are current and accurate.
 - c. You have the right to opt-out of our use of your personal information to provide marketing to any of the ways mentioned above, and/or manage your preferences. Please see 'Withdrawing your consent and objecting to our use of your personal information and automated decisions made about you' above for further details on how you can do this.

12. Contact us

Please direct any queries about this policy or about the way we process your personal information to our Data Protection Lead using our contact details below:

If you wish to write to us, please write to the Data Protection Lead at The Game Changer Company, Our email address for data protection queries is contact@thegamechangercompany.io