

# WILDHEARTS GROUP

## Data Privacy Policy

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|--------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Document Reference | P.12                                                                                                                                     |
| Issue              | 05                                                                                                                                       |
| Date               | June 2026                                                                                                                                |
| Review Due         | June 2027                                                                                                                                |
| Policy Owner       | BMS Manager                                                                                                                              |
| Authorised By      | BMS Manager                                                                                                                              |
| Related Documents  | Data Protection Policy (P.13)   OP.01 Section 15   R.10 (Register of Personal Data Capture)   R.12 (Register of Subject Access Requests) |

*This policy applies to all individuals whose personal data is processed by WildHearts Group.*

## 1. Introduction

WildHearts Group understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone whose data we hold and will only collect and use personal data in ways that are described in this notice and in a way that is consistent with our obligations and your rights under the law.

This notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

Throughout this notice, the following entities are collectively referred to as “WildHearts”, “we”, “our”, or “us”:

- WildHearts Group Limited (ZC172585)
- WildHearts Office Limited (ZA064756)
- WildHearts Talent Limited (ZA064758)
- WildHearts Foundation (ZA064760)

All are incorporated in Scotland with Registered Office at 5A The Square, 95 Morrison Street, Glasgow, G5 8BE.

## 2. What is Personal Data?

Personal data is defined by the UK General Data Protection Regulation (UK GDPR) as any information relating to an identifiable person who can be directly or indirectly identified, in particular by reference to an identifier. In simpler terms, personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Special category data is a subset of personal data that is given additional protection under UK GDPR because of its sensitive nature. It includes information about health, disability, racial or ethnic origin, religious beliefs, and biometric data. Where we process special category data — for example, employee health or disability information — we do so only where a specific condition under UK GDPR Article 9 and the Data Protection Act 2018 is met.

## 3. What Personal Data Do We Collect?

### 3.1 Customer, Contact, and Supporter Data

Depending on your relationship with us, we may collect some or all of the following:

- Name
- Email address
- Business or employer name and address
- Delivery address (which may be a home address)
- Contact telephone number
- Job title
- School year group
- Pupil premium or SIMD eligibility number

### 3.2 Employee Data (employees only)

In addition to the above, for employees we also collect:

- Home address
- Date of birth and gender
- Education, qualifications, and work experience
- National Insurance number and tax code

- Bank account information
- Details of any known disability or health condition
- Sickness and absence information
- Emergency contact details
- Other information relevant to your employment

Employee health and disability information is special category data under UK GDPR Article 9. We process this data on the basis of our obligations as an employer under employment law (DPA 2018 Schedule 1) and only to the extent necessary for those purposes.

#### 4. How and Why Do We Use Your Personal Data?

Under UK GDPR, we must always have a lawful basis for using personal data. The table below sets out the purposes for which we process personal data, the lawful basis for each, and the relevant UK GDPR provision.

| Purpose of Processing                                                                | Lawful Basis                                                                                          | UK GDPR Reference                               |
|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| Providing and managing your account and delivering our products and services to you. | Performance of a contract, or steps taken at your request prior to entering a contract.               | UK GDPR Article 6(1)(b)                         |
| Communicating with you about your account, orders, or enquiries.                     | Performance of a contract; or legitimate interests (effective customer communication).                | UK GDPR Article 6(1)(b) / 6(1)(f)               |
| Sending our monthly e-Newsletter and programme updates.                              | Consent (where obtained); or legitimate interests (B2B soft opt-in where applicable under DUSA 2025). | UK GDPR Article 6(1)(a) / 6(1)(f); PECR Reg. 22 |
| HR and employment administration (employees only).                                   | Performance of a contract of employment; legal obligation; legitimate interests.                      | UK GDPR Article 6(1)(b) / 6(1)(c) / 6(1)(f)     |
| Processing employee health, disability, or sickness data (employees only).           | Necessary for employment law obligations; substantial public interest (DPA 2018 Sch. 1).              | UK GDPR Article 9(2)(b); DPA 2018 Schedule 1    |
| School and pupil programme data (programme delivery).                                | Performance of a contract with the commissioning school or local authority; legitimate interests.     | UK GDPR Article 6(1)(b) / 6(1)(f)               |
| Complying with legal or regulatory obligations.                                      | Legal obligation.                                                                                     | UK GDPR Article 6(1)(c)                         |

Where we rely on consent as the lawful basis for processing, you have the right to withdraw your consent at any time without affecting the lawfulness of processing carried out before withdrawal. To withdraw consent, please contact us using the details in Section 10.

Where we rely on legitimate interests as the lawful basis for processing, we first undertake a Legitimate Interests Assessment (LIA) to ensure that our processing is necessary, proportionate, and does not override your rights and freedoms. You have the right to object to processing based on legitimate interests — see Section 5 for details.

## 5. Your Rights

Under UK GDPR, you have the following rights in respect of your personal data. We will always work to uphold these rights:

- The right to be informed — to know how and why your personal data is being used. This notice provides that information.
- The right of access — to request a copy of the personal data we hold about you. See Section 8 for how to make a subject access request.
- The right to rectification — to have inaccurate or incomplete personal data corrected without undue delay.
- The right to erasure ('right to be forgotten') — to ask us to delete personal data we hold about you in certain circumstances.
- The right to restrict processing — to ask us to pause the processing of your personal data, for example while the accuracy of the data is contested.
- The right to data portability — to receive a copy of your personal data in a structured, commonly used, and machine-readable format, and to have it transmitted to another controller. This right applies where processing is based on consent or contract and is carried out by automated means.
- The right to object — to object to processing based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will stop processing your data for that purpose immediately.
- Rights in relation to automated decision-making and profiling — not to be subject to a decision based solely on automated processing that produces legal or similarly significant effects. We do not currently use your personal data in this way.

For more information about your rights, or to exercise any of them, please contact us using the details in Section 10. Further information about your rights can also be obtained from the Information Commissioner's Office (ICO): [ico.org.uk](https://ico.org.uk) or 0303 123 1113.

## 6. How Long Do We Keep Your Personal Data?

We will not keep your personal data for any longer than is necessary in light of the purpose or purposes for which it was originally collected. The table below sets out our retention periods by category of personal data.

*Two categories in the table below are highlighted: (1) DBS certificate information — the certificate itself is not retained beyond six months from the date of the check in accordance with the DBS Code of Practice, but the outcome and date of the check are noted and retained for the duration of employment; (2) Employee health and sickness records — retained for three years post-employment to enable WildHearts to respond to any personal injury or occupational health claim brought within the three-year limitation period under the Limitation Act 1980.*

| Category of Personal Data                                               | Retention Period                                                                                                                                                                                                      |
|-------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CRM and marketing data (name, email, job title, employer, contact role) | Retained until an erasure or opt-out request is received. You have the right to request deletion at any time by contacting us at <a href="mailto:compliance@wildheartsgroup.com">compliance@wildheartsgroup.com</a> . |
| Marketing opt-out and suppression records                               | Retained indefinitely to ensure we do not contact you again.                                                                                                                                                          |
| Contract and compliance records (customer contracts and agreements)     | Seven years from the end of the customer relationship, to enable the establishment, exercise or defence of legal claims in line with the Limitation Act 1980 (including a 12-month litigation buffer).                |

| Category of Personal Data                                                                                           | Retention Period                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Finance records (invoices, payment records)                                                                         | Six years from the end of the financial year to which they relate, as required by HMRC and the Companies Act 2006.                                                                                                           |
| Employee personal data (contact details, home address, education, qualifications, bank account, emergency contacts) | Deleted within 12 months of the end of employment.                                                                                                                                                                           |
| Employee name and job title                                                                                         | Retained to enable the provision of employment references. Deleted on receipt of a valid erasure request.                                                                                                                    |
| Employee payroll records (National Insurance number, tax code, passport)                                            | Six years from the end of the tax year in which employment ended, as required by HMRC.                                                                                                                                       |
| Employee health, sickness, and absence records                                                                      | Three years from the end of employment, in line with the personal injury limitation period under the Limitation Act 1980.                                                                                                    |
| Employee DBS check information                                                                                      | The outcome and date of a DBS check are noted and retained for the duration of employment. The certificate itself is not retained beyond six months from the date of the check, in accordance with the DBS Code of Practice. |
| Talent programme participant data (Learnworlds platform)                                                            | Deleted within one month of programme completion.                                                                                                                                                                            |
| Talent programme participant data (SharePoint records)                                                              | Retained for 10 years to enable ongoing delivery of insights to commissioning employers and to support coaching identification.                                                                                              |
| Event attendee data                                                                                                 | Three years from the date of the event.                                                                                                                                                                                      |
| Apprenticeship student data                                                                                         | Deleted within 12 months of the end of the apprenticeship programme.                                                                                                                                                         |
| Schools — pupil and children's data                                                                                 | Anonymised within three months of the end of the relevant event or programme.                                                                                                                                                |
| Schools — teacher and volunteer data                                                                                | Retained while the programme delivery relationship continues. You may request deletion at any time.                                                                                                                          |
| Guest lecturers and programme supporters                                                                            | Retained while the individual is active as a contributor or while related content remains in use.                                                                                                                            |
| Photography and video consent records                                                                               | Retained indefinitely while the photography or video content is in active use.                                                                                                                                               |
| Director and trustee data                                                                                           | Retained for 12 months after the individual ceases to hold the relevant position.                                                                                                                                            |
| Subject access request records                                                                                      | Retained indefinitely (name and outcome only, in accordance with ICO guidance).                                                                                                                                              |

We review our data holdings at least annually. Personal data that is no longer required is securely destroyed or anonymised in accordance with our internal data management procedures. In some cases, legal or regulatory requirements or ongoing litigation may require us to retain data for longer than the standard periods set out above. Where this applies, we will inform you if required to do so by law.

## 7. How and Where Do We Store or Transfer Your Personal Data?

We primarily store personal data within the United Kingdom. Where data is processed by our approved cloud service providers (including Microsoft 365), it may be transferred to or processed in countries outside the UK. We ensure that appropriate safeguards are in place for any such transfer in accordance with UK GDPR, including adequacy regulations or UK International Data Transfer Agreements (UK IDTAs) where required.

WildHearts also delivers programmes in partnership with organisations in Malawi, Zambia, Zimbabwe, and South Africa. Where personal data is transferred to or processed in these countries in connection with programme delivery, we ensure that appropriate safeguards are in place in accordance with UK GDPR Articles 44 to 49. Where no UK adequacy decision applies to the destination country, we use UK IDTAs or other appropriate transfer mechanisms.

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. We use Microsoft 365 as our primary cloud platform, with security monitoring and access controls managed with the support of our IT provider. If we have given you a password to access certain areas of our website or services, please keep it safe — we will not share it with anyone.

If you believe your account or data has been compromised, please contact us immediately at [compliance@wildheartsgroup.com](mailto:compliance@wildheartsgroup.com).

## 8. Do We Share Your Personal Data?

Personal data may be shared within the WildHearts Group entities listed in Section 1, and processed in accordance with this notice and our internal data protection policies.

We also work with a small number of trusted third parties who assist in the delivery of our services. These include:

- Fulfilment partners who deliver aspects of our services. Personal data shared with such partners is restricted to what is necessary for the fulfilment of contractual obligations.
- Technology and IT service providers (including cloud hosting, backup, and security services) who support the delivery and security of our systems. Where personal data is processed by such providers, it is done under written Data Processing Agreements and in accordance with applicable data protection law.
- Programme delivery partners, including schools, local authorities, and partner organisations in the UK and overseas.

In some limited circumstances, we may be legally required to share personal data with law enforcement agencies, courts, or regulatory authorities. We will only do so where we are legally required or authorised to do so.

We do not and will not sell, rent, or trade your personal data to any third party.

## 9. Cookies and Website Analytics

When you visit our website, we may use cookies and similar tracking technologies. A cookie is a small text file placed on your device by our web server. It enables the server to recognise your browser and provide a more personalised experience.

### 9.1 Types of Cookie

- Essential cookies — these are strictly necessary for the website to function (for example, to maintain your session). They cannot be disabled.
- Analytics cookies — these help us understand how visitors use our website (for example, via Google Analytics). Under the Data (Use and Access) Act 2025, analytics cookies that are used solely to measure website performance and improve user experience may be exempt from consent requirements. Where this exemption applies, we will use analytics in a privacy-preserving way (anonymised IP addresses, no cross-site tracking, no sharing of data with Google for advertising purposes).
- Non-essential cookies — any other cookies that are not strictly necessary or analytics-only require your consent before being placed on your device. You can manage your cookie preferences via the cookie banner on our website.

### 9.2 Google Analytics

We use Google Analytics to collect standard internet log information and details of visitor behaviour on our website. This data is processed in a way that does not identify individual visitors. We do not allow Google to use or share our analytics data for any purpose other than providing the analytics service. Google's privacy policy is available at: [policies.google.com/privacy](https://policies.google.com/privacy).

### 9.3 Managing Cookies

You can manage and disable cookies through your browser settings at any time. Please note that disabling certain cookies may affect the functionality of our website. Where your consent is required for specific cookies, you can withdraw that consent at any time using the cookie preferences tool on our website.

## 10. How to Make a Subject Access Request

You have the right to request a copy of the personal data we hold about you. This is known as a Subject Access Request (SAR). There is normally no charge for making a SAR.

To make a SAR, please contact us using the details in Section 11. If you would like to use a Subject Access Request Form to help us process your request efficiently, please email [compliance@wildheartsgroup.com](mailto:compliance@wildheartsgroup.com) and we will send one to you. You are not required to use the form — any written request is valid.

We will respond to your request within one calendar month of receipt. Where your request is particularly complex or we have received a number of requests, we may extend this period by a further two months — we will notify you within the first month if an extension is required. If we need to pause the clock to seek clarification from you (as permitted under the Data (Use and Access) Act 2025), we will notify you promptly.

*If your request is manifestly unfounded or excessive, or if you make repetitive requests, we reserve the right to charge a reasonable fee or to decline to respond. We will explain our reasoning if this applies.*

## 11. How to Contact Us

To contact us about anything to do with your personal data and data protection — including to exercise any of your rights, make a subject access request, or raise a concern — please use the following details:

|                                |                                                                                    |
|--------------------------------|------------------------------------------------------------------------------------|
| <b>Data Protection Contact</b> | WildHearts Group Data Protection Contact                                           |
| <b>Email</b>                   | <a href="mailto:compliance@wildheartsgroup.com">compliance@wildheartsgroup.com</a> |
| <b>Telephone</b>               | 0141 611 9777                                                                      |
| <b>Postal Address</b>          | 5A The Square, 95 Morrison Street, Glasgow, G5 8BE                                 |

If you have a concern about how we have handled your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), which is the UK supervisory authority for data protection matters:

- Website: [ico.org.uk](https://ico.org.uk)
- Telephone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

We would, however, appreciate the opportunity to address your concerns before you contact the ICO — please contact us at [compliance@wildheartsgroup.com](mailto:compliance@wildheartsgroup.com) in the first instance.

## 12. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. This may be necessary if the law changes or if we change our business in a way that affects personal data processing. This notice is version-controlled within our Business Management System (reference P.12) and the current version is always published on our website. We will notify you of any material changes where we have your contact details and it is appropriate to do so.