

# METRICA PRIVACY POLICY

*"...In the digital era, privacy must be a priority..."*

Al Gore

## METRICA Group Privacy Policy

This policy applies to all of METRICA Group's:

- Employees
- Clients
- Candidates
- Business Associates and Partners
- Third Party Vendors, and
- Website users

This policy describes the organisation's objectives and policies regarding responding to, and handling of personal data.

## Who Are We ?

We are the METRICA Group, the trading name of twinned companies:

- METRICA Consulting LLP, and
- METRICA Coaching Ltd

Companies House numbers OC425954 and 14540612, respectively.

The registered address for both companies is:

71-75 Shelton Street, London WC2H 9JQ

Our contact details are:

- [admin@metrica.uk](mailto:admin@metrica.uk)
- [www.metrica.uk](http://www.metrica.uk)
- Switchboard: +44 (0) 20 3728 6199
- 24 Hour line: +44 (0) 7771 357 423

Together we provide products and services to ambitious individuals and organisations alike, across the following five specialisms:

- Financial Markets Insights
- Business & Board Advisory
- Corporate Culture & Values
- Executive Coaching & Learning
- Career Hub & Services

For a detailed list, please see our website, or contact us directly.

## What Does this Policy Cover ?

We at the METRICA Group take your personal data very seriously. This policy explains and sets out:

- The types of personal data we collect about you
- How and why we collect and use your personal data
- How long we keep your personal data for
- When, why, and with whom we will share your personal data
- The legal basis we have for using your personal data
- The effect of refusing to provide the personal data requested
- The different rights and choices you have when it comes to your personal data, and
- How we may contact you and how you can contact us

## Keeping Your Personal Data Secure

We have put in place appropriate organisational and technical measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

## What Personal Data Do We Collect About You

We collect only the information necessary to be able to support the effective provision of our products and services, see above or our website, or to comply with our legal and contractual responsibilities. These may include:

- **Identity data:** your first name or the name you go by, last name, marital status, title, date of birth, and gender

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- **Contact data:** your billing and delivery addresses, email address, telephone number, or other social media access or contact point
- **Financial data:** your bank account, or payment card details
- **Transaction data:** details about payments between us, or of other relevant purchases you have made
- **Technical data:** when relevant, your login data, internet protocol address, browser type and version, or other technology if you access our site
- **Profile data:** username, purchase orders, any interests or preferences, feedback, or survey responses
- **Usage data:** how you use our website, products and services
- **Marketing and Communication data:** your preferences in receiving marketing communications from us and your preferences for how we communicate together
- **Aggregated data:** we may also choose to process aggregated data from your personal data. But this data does not reveal your identity and as such in itself, is not personal data
- **Sexual orientation:** but only if you disclose this to us as part of a gender-specific mentoring or coaching program
- **Other Personal data:** we may also collect other personal data about you, in the form of background reference checks, remuneration and compensation details, passport scans and other relevant data needed for a potential role
- We **only** collect **other personal data** for you where you have given your **explicit consent**
- **Contract data:** this is the information necessary to complete contracts of engagement between the METRICA Group and its clients, candidates, business associates and partners, and third party vendors
- **Client and supplier data:** is processed by us under the lawful basis of contractual necessity

We do **NOT** collect any of the following data:

- Details about your **race** or **ethnicity**, **religious** or **philosophical** beliefs, **sex life**, **sexual orientation** (with the one exception highlighted above for specific gender coaching / mentoring), **political** opinions, **trade union** membership, information about your **health** and **genetic** and **biometric** data
- We do not collect any information about **criminal** convictions and offences

In addition to the above, we may also collect data as follows:

- **Performance data:** if pursuing one of our business coaching and mentoring modules, or one of our executive coaching, or learning modules, we may record your individual performance data to demonstrate and measure your progress, which might also be shared with your relevant managers and H.R. personnel, but only if agreed ahead of time
- **Career Data:** the information necessary to find available career opportunities and roles, and any further information needed to assess your eligibility through the various stages of recruitment for Boards, or other roles which we may be advised of, from time to time
- This includes CVs, identification documents, educational records, work history, employment references, details of activities during any career break, and any compensation and performance history, and our contact history
- These also address if you ask us to draft any of your relevant documents for a potential role including your CV, LinkedIn profile, biography, pitching documents, or if you choose one of our career coaching options

## How Do We Collect Your Personal Data ?

The following are the diverse sources we may collect personal data about you from:

- Directly from you. This is information you provided if you are a business contact, or client, of the METRICA Group, or if you signed up to join any of our products and services, or while meeting with us, or interviewing with us, or expressed an interest in our services, or if you registered for one of our free resources through our website
- From an agent/third party acting on your behalf
- Through publicly available sources - we use the following:
  - LinkedIn
  - Google and similar search engines
  - Bloomberg
  - Financial news media
  - FCA Website
  - Companies House
- By reference or word of mouth. For example, you may be recommended by a friend, a former employer, a former colleague or even a present employer, or via an existing client, or business contact

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## How And Why We Use Your Personal Data ?

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal, or regulatory obligation

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in sending you marketing communications to you via email, or text message.

You have the right to withdraw consent to marketing to us at any time by emailing us at [admin@metrica.uk](mailto:admin@metrica.uk).

Our legitimate business interests include our relationships with other parties, and our obligations to you for the products and services which you sign up to, which might include:

- **Financial Market Insights:** subscription to our weekly markets' newsletter, Wall-Street-Chat; updates for our Financial Market Forums; or our other Trade Performance Services, including our training module, Performing-Under-Pressure; or other one-off requests
- **Business Board & Advisory:** Strategic Consultancy; Board support - including hiring; updates for our Complementary Boards; Business Coaching & Mentoring; our Learning Programs and Workshops; and for our Networking and Business Referrals
- **Corporate Values & Culture:** addressing your organisation's Purpose & Values; Governance; Diversity E&I; Well-being & Resilience; Appraisal & Rewards; Culture Mapping & Monitoring
- **Executive Coaching & Learning:** growing individual Knowledge & Skills; Executive Coaching & Mentoring; Leadership Development
- **Career Hub and Services:** addressing your Job Search, Return to Work, or Outplacement; Career Coaching; writing your relevant documents, or profiles; Interview Training; Effective Networking; using Job platforms & AI; and Dispute Resolution

- **Job Search, Return to Work, Outplacement:** address matching your qualities, transferrable skills, experience, knowledge and education with a potential employer or to help find the right candidate for the employer. We will initially collect basic information on you such as contact details, job role and experience and then pass this on to the client in search of personnel. If you are chosen by the client and go through to the next stage(s) we will then be collecting more information from you at the interview (or equivalent) stage and onwards in that manner and will seek your consent to do this

For any and all of these, we will contact you either by telephone, email or other social media.

- You can unsubscribe from these emails at any time
- We will also communicate with you on email, telephone, or other social media about other resources, events and webinars that we think will be directly relevant and useful to you
- We may contact you to ask or survey your opinion to assist us with the delivery of our services and for research purposes
- We may use other personal information you provided us with on an aggregated anonymous basis to understand the composition of our network. We do not disclose any of this information on an individual basis

## How Long Do We Keep Your Personal Data For ?

We only retain your information for as long as is necessary for us to use your information as described above, or to comply with our legal obligations. For example, we may retain some of your information after you cease to use our services, if this is necessary to meet our legal obligations, such as for tax and accounting purposes.

When determining the relevant retention periods, we will consider factors including:

- Our contractual obligations and rights in relation to the information involved
- Legal obligation(s) under applicable law to retain data for a certain period of time
- Our legitimate interest where we have conducted a balancing test (see legal basis below)
- Statute of limitations under applicable law(s)

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- (Potential) disputes
- If you have made a request to have your information deleted, and
- Guidelines issued by relevant data protection authorities

Otherwise, we securely erase your information after seven years if we have had no communication with you (or any companies or third parties we are working for or with) about any of our products and services.

## Who Do We Share Your Personal Data With ?

We may have to share your personal data with the parties set out below, consistent with the section, How and Why We Use Your Personal data, above:

- Service providers of IT and system administration services e.g. Mailchimp.com, or Substack.com
- Professional advisers, including lawyers, bankers, auditors, insurers providing appropriate services
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom
- Third parties to whom we sell, transfer, or merge parts of our business or our assets

In addition, when relevant to the following products and services:

- **Financial Market Insights:** when introducing new members to our Financial Market Forums
- **Business Board & Advisory:** when hiring on behalf of companies for their Boards, or introducing new members to our Complementary Boards
- **Corporate Values & Culture:** when individual cases might shape, or change an organisation's Values and Culture
- **Executive Coaching & Learning:** when we might sub-contract some of these services if we do not provide them directly ourselves, or if we share performance data for the ones we do provide
- **Career Hub and Services:** when our clients are seeking to recruit profiles to their companies that may match your interests and desire to be hired, but only after we have sought your permission, first. In particular, we may share your personal data to ascertain your potential fit for an available role. We may also conduct checks on the information you have provided with our network

and personal contacts across your areas of focus

## What Legal Basis Do We Have For Using Your Information ?

Our data processing is necessary for our legitimate business interests, and to comply with our legal and regulatory obligations.

We conduct a "balancing test" to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests before we go ahead with such processing.

We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.

## What Happens If You Do Not Provide Us With The Information We Request, Or Ask That We Stop Processing Your Information ?

If we do not have or you do not provide the necessary personal data, or withdraw your consent for the processing of your personal data, we may not be able to fulfil our obligations to you for the products and services you might seek.

We may find ourselves in the position of not being able to fulfil our other legal and regulatory responsibilities.

## Do We Make Automated Decisions Concerning You ?

No, we do not conduct automated profiling.

## Do We Use Cookies to Collect Personal Data On You ?

No, we do not use cookies for tracking purposes for individual data, but we do use cookies to collect data on an aggregated basis, see Page 2 above.

## Do We Transfer Your Data Outside the EEA ?

No, we do not transfer your data outside the EEA.

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## What Rights Do You Have in Relation to the Data We Hold On You ?

- **The Right to be Informed:** you have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Policy.
- **The Right of Access:** you have the right to obtain access to your information (if we are processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you are aware and can check that we are using your information in accordance with data protection law.
- **The Right to Rectification:** you are entitled to have your information corrected if it is inaccurate or incomplete.
- **The Right to Erasure:** this is also known as "the right to be forgotten" and, in simple terms, enables you to request the deletion or removal of your information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
- **The Right to Restrict Processing:** you have rights to "block" or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- **The Right to Data Portability:** you have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
- **The Right to Object to Processing:** you have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
- **The Right to Lodge a Complaint:** you have the right to lodge a complaint about the way we manage or process your personal data with your national data protection regulator.
- **The Right to Withdraw Consent:** if you have given your consent to anything we do with your

personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing

## Acting on Your Requests

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- Baseless, or excessive, or repeated requests
- Further copies of the same information

Alternatively, we may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it.

We will respond 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 come back to you and let you know.

## Contacting Each Other

If you are unhappy with how we have managed your information, or have further questions on the processing of your personal data, please contact us via [admin@metrica.uk](mailto:admin@metrica.uk), or:

Data Privacy  
The METRICA Group  
71-75 Shelton Street  
London WC2H 9JQ

We may contact you by phone, email, or social media. Please advise us of your preferred means of contact if different from any of the above.

## Updating our Privacy Policy

From time to time, the METRICA Group amends this policy. If you want to stay up to date with any changes, please visit this page.

(Last updated April 2024)