

Contact details

My360plus is owned by the Forton Group Ltd, registered with the ICO under registration reference Z6898165

Registered Office: College Farm, Main Street, Willoughby, Rugby, Warwickshire, CV23 8BH, United Kingdom

For all GDPR enquiries contact info@my360plus.com

We support both the spirit and letter of the GDPR.

DATA held for the purposes of delivering my360plus services

Our lawful basis for holding data is:

1. Enquiries: Information provision – we provide information in response to enquiries from organisations or members of the public using the following data:

- a. Name/surname
- b. Job title
- c. Organisation
- d. Email
- e. Phone
- f. Address (if printed material requested)

3. Education and training – we hold the following student data

- a. Name/surname
- b. Job title
- c. Organisation
- d. Email
- e. Phone
- f. Address (if printed material requested)

4. Specifically, for Chartered Management Institute (CMI) educational requirements, we may additionally hold the following data

- Date of Birth
- Professional body registrant or membership number (e.g. GDC)

5. Specifically, for International Coach Federation (ICF) educational and accreditation requirements, we may pass relevant data outside the EU (to the UK and USA).

6. Users of the Forton Group online learning management system (LMS) will be registered on the 'Full Partner' LMS and their name and email data (accessible via password) will be held outside the EU (UK and USA). LMS users control their own passwords.

7. Educational data must be held for up to three years for record keeping and verification purposes.

8. The my360plus online survey system collects three types of data:

- a. Customer administration data for dashboard access
- b. Participant data
- c. Observer data



The my360plus Legacy System

In August 2018, The Forton Group Ltd bought the my360plus service and reviewed the underpinning software system. In November 2018 an upgrade was launched. This includes the removal of the need to ask for gender and date of birth details. At the time of writing (February 2019), it is expected that the transfer to the upgraded system will happen by the 1st April 2019.

Until that point the current system will collect gender details for the purpose of the emails sent to observers (to refer to the participant by their personal pronoun) and their date of birth. Until this new system can be put in place, we advise participants to use a nominal date of birth, such as 01-01-1900.

Data control and removal

Administration and Participants control their username and email address under password.

- Administrators can be removed at any time and should be removed on change of role
- Data from enquiries or information provision can be removed at any time.
- Participant personal data can be removed 1 year after completion of the annual subscription, or renewed, on request.
- Student data can be removed after 3 years.

Storage and sharing

We have documented what personal data we hold, where it came from, who we share it with and what we do with it.

We store data through third party suppliers in these ways:

- Mailing systems: Lifeboat marketing and Outlook
- Dropbox secure file storage system
- Learning Management Systems (Full Partner)
- Live Virtual Classroom Service (Zoom)
- Conference Calling service (Powwownow)

We have written agreements with these suppliers as to the security of your data and processes in the event of any security breach. This includes the security of personal data processed by others on our behalf that is transferred outside the European Economic Area (e.g. cloud storage).

Right of access & right to object

- You can access the data/ information we hold on you by providing a valid email address, and proof of name to info@my360plus.com
- We will respond within 14 days; part of our process is to check the name/email given.
- Current Registered Students, Administrators and Participants can update their own data, using their Username and Password.
- You have the right to object to our holding data.

GDPR Privacy Notice

- For all GDPR enquiries contact info@my360plus.com
- The Lead Data Protection Officer and Controller is Helen Caton-Hughes, Managing Director.
- We train all Staff, Faculty Members and Associates in our policies and in the GDPR requirements.
- Our non-EU regional Directors are also appointed and trained in the GDPR requirements.
- Your right to rectification If your data is incorrect, we will update it within 14 days of notice.
- We will contact you annually to confirm your data is correct and that (in the case of information provision) you wish to remain on our database.



GDPR and Data Protection Privacy Notice

- For students, we will contact you at the end of 3 years from the start date of your education programme to check whether you wish to remain on the database.

Secure disposal

We will make all reasonable efforts to ensure that your data is safely disposed of.

Your right to restrict access

You have a right to expect us to restrict access to your data for the purposes you choose.

We offer the following restrictions:

- Registered Participant
- Student
- Psychometric tools – User, Observer or Rater
- Corporate client
- Coach
- Other educational materials or courses (video, audio, written)
- Information
- Opt-in • Leadership • Coaching & Mentoring • Psychometric tools (e.g. my360plus) • Accredited qualification programmes • ELearning Student

Data: Legitimate Interest Assessment and Statement

The Forton Group provides research, education, leadership development and coaching services through a range of brands and companies:

Companies

- The Forton Group Limited
- The Leadership Coach Limited
- Dental Coaching Academy

Brands/websites

- My360plus
- Professional Leadership Coaching
- Dental Education Centre
- Igniting Excellence in leadership

What is Forton's "Legitimate Interest"?

The Forton Group is an educational organisation specialising in leadership development and coaching. It is currently accredited by the International Coach Federation and by the (UK) Chartered Management Institute. It registers my360plus participants and observers; training course participants ('students')– who learn through in-person and virtual (digital) methods, accessing reading, audio and visual materials.

- A Participant is defined as someone registered by their employer for the purpose of undertaking a self-assessment and receiving online 360 degree feedback from observers.
- An Observer is defined as someone registered by their employer, or a colleague for the purpose of giving online 360 degree feedback to participants.
- An Administrator is defined as someone registered, with the permission of their employer, to administer the my360plus dashboard on behalf of their employer.
- A Partner is defined as a customer of my360plus, and supplier to an end-user client or customer of the my360plus service. A Partner may also be an Administrator for the purpose of managing the my360plus dashboard.
- A Student is defined as someone who registers for some educational material themselves, or is registered by their employer.

Participants, Observers, Partners, Students and Administrators are registered via email, websites, the my360plus system and the Forton Learning Management System (LMS).

Updated 21/02/2019

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Customers and Partners who register clients or staff members for the purpose of using the my360plus services are informed of the following statement:

"For development purposes (using the my360plus system) we will keep participant and observer records for a minimum of one year (the standard my360plus subscription term) and after that for the purpose of renewing the subscription at the request of the Customer or Partner. Data held will be kept to the minimum. After this point, personal data will be removed and remaining data will be used for anonymous verification of the my360plus benchmarking data."

Individual or corporate customers who train staff members are informed of the following statement:

"For educational purposes (leadership development and/or coaching) we will keep student records for a minimum of three years and after that for the purposes of providing proof of attendance/completion to the student (e.g. for attendance dates/lost certificates/letters etc) or at the request of ICF/CMI or other accrediting bodies. Data supplied will be kept to the minimum. Students can opt out at any time, on the understanding that the Forton Group will be unable to provide attendance evidence once the student has opted out."

Why data processing is necessary to deliver the service

Personal data is necessary to:

- Email any instructions, reminders or development goals to Participants and/or Observers
- Maintain the dashboard records
- Communicate between the Partner and/or Customer and my360plus
- Email any written educational material, logistics information (e.g. date/time of event, location, access passwords etc)
- Use Username and Passwords to access student-only learning materials
- Keep records for producing certificates and for informing any relevant accrediting bodies

This need is balanced against the individual's interests, rights and freedoms in the following ways:

- Keeping the minimum data necessary (usually name, email, phone number, and address if printed materials are sent by post)
- Keeping any additional data only if required by an accrediting or professional body (e.g. date of birth (CMI) or professional registrant number (GDC))
- Students/Participants/Observers/Administrators can opt out at any time, on the understanding that the Forton Group will be unable to provide materials or evidence once the person has opted out.

Consent

Consent is not a pre-condition of a service. However, withholding or removal of consent does have specific, practical implications: that is, the Forton Group will be unable to provide logistical information, participant reports, educational services or attendance evidence once a relevant person has opted out.