



PRIVACY POLICY

Purpose of this Privacy Policy

We are committed to protecting your personal information and to being transparent about the information we hold about you. Using personal information allows us to provide an efficient and effective service to our clients. The purpose of this policy is to give you a clear explanation about how we collect and process your personal information.

Resonate Leadership Limited is the controller of personal data in relation its coaching and leadership development programmes. If you have any questions about your personal data, please contact eadine@resonateleadership.com.

This policy explains:

- 1. Who we are
- 2. Information we may collect about you
- 3. How we collect your data
- 4. How we may use your information
- 5. Disclosure of your details to third parties
- 6. Security of your personal information
- 7. Data retention
- 8. Your legal rights
- 9. Notification of changes to our privacy policy
- 10. Contact details and further information

1. Who We Are

Resonate Leadership Ltd. is a boutique leadership development and executive coaching practice. We provide coaching services to senior executives in a variety of sectors as well as a select number of leadership development programmes with partner organisations.

Resonate Leadership Ltd. is registered in Dublin Ireland, number 574095.

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2. Information we may collect about You

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, i.e. anonymous data.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- Identity Data includes first name, last name, organisation name, role.
- Contact Data includes email address, telephone numbers and billing address, delivery address (where appropriate).
- Coaching Data: Notes from individual or group coaching sessions or workshops, any information provided by a coachee or participant as part of a leadership programme and psychometric data (including 360 feedback).
- Financial Data includes bank account details (yours or your organisation's as appropriate)
- Transaction Data includes details about payments to and from you or your organisation.

Aggregated Data may be derived from your personal information but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate themes from a leadership programme which does not reveal your identity. If we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How we collect your Data

We collect different information about you in a number of ways:

Information you give us

When you sign up for a coaching engagement or leadership programme, or our newsletter via our web-site, you provide information which may fall into the categories mentioned above (identity data, contact data, coaching data etc.). As we further engage, you may share other information pertinent to your development or the coaching engagement. Notes may also be taken of conversations to assist in future coaching sessions or conversations with the aim of providing you with the best service possible.

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Psychometric Data or 360 Feedback:

In the event that you engage us to provide a psychometric tool (e.g. Fearless Organisation/ Psychological Safety Scan, Myers Briggs, Emotional Intelligence Assessment, 360 feedback) as part of a coaching engagement or leadership development programme, information will be gathered by the tool provider and furnished to your Resonate Leadership coach before being shared with you.

Note: In the case of the Leadership Agility® 360, the data is captured by a U.S. based partner organisation called Cambria, who have a Privacy Shield arrangement in place (thereby complying with EU data protection requirements). They will ask participants for consent directly on their website when participating. The following two paragraphs relate to this situation.

In connection with the above purposes, we may transfer your personal data outside the European Economic Area, including to a jurisdiction which is not recognised by the European Commission as providing for an equivalent level of protection for personal data as is provided for in the European Union. If and to the extent that we do so, we will ensure that appropriate measures are in place to comply with our obligations under applicable law governing such transfers, which may include entering into a contract governing the transfer which contains the "standard contractual clauses" approved for this purpose by the European Commission, or in respect of transfers to the United States of America, ensuring that the transfer is covered by the EU-US Privacy Shield framework. Further details of the measures that we have taken in this regard and the territories to which your personal data may be transferred are available by contacting us directly.

When we share your data with the third parties outlined here, we will ensure that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained.

Automated technologies or interactions

Should you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.

Information from third parties

Should you interact with our website, we may occasionally receive information about you from Analytics providers such as Google.





4. How we may use your Information

We will use your personal data in order to provide the best possible experience to you as a coaching client, participant in a leadership development programme or recipient of our newsletters. The following is worth noting:

- Notes from coaching sessions are maintained to ensure continuity between sessions.
- The content of coaching conversations is confidential unless there is danger to a person or person or if illegal activity is evident.
- As per coaching best practice, coaches/ facilitators may share anonymised information relating to a coaching engagement or leadership programme with a coaching supervisor.
 This is done in the interest of providing the best possible service to clients.
- 'Chatham House Rules' are applied during leadership programmes and team coaching engagements. Therefore, the detailed content of in-class conversations will not be shared beyond programme faculty. Where different facilitators are used for different workshops, some sharing will arise between faculty to ensure smooth transitions between workshops.

5. Disclosure of your Details to Third Parties

Where you have engaged with us for a workshop or leadership development programme, your identity data and contact data may be shared with coaches / facilitators/ leadership programme faculty in the event that they need to make contact with you e.g. to arrange a coaching session. These facilitators/ coaches will also follow this Privacy Policy when working with Resonate Leadership Ltd.

When using a psychometric assessment, we will provide your details to the provider of the tool so they can administer the assessment. This may include the Fearless Organisation/ Psychological Safety Scan, Leadership Agility® 360, Myers Briggs and others. We will advise of this in advance and give an opportunity for you to declare your wish not to be part of this process if appropriate.

6. Security of your personal information.

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties (coaches or facilitators) we use for processing your personal information do the same and that they will only process your personal information on our instructions. These third parties will also be subject to a duty of confidentiality.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR (e.g. our US—based partner Cambria administers the Leadership Agility $^{\circ}$ 360 and has Privacy Shield in place).





7. Data Retention

We will retain your personal data for 7 years as required by our professional indemnity insurer. If you have subscribed to our newsletter, you will remain subscribed unless you choose otherwise.

8. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal information, as follows:-

- a) Right access to your personal information: You have a right to request a copy of the personal information that we hold about you, together with other information about our processing of that personal data.
- b) Right to rectification: You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.
- c) Right to erasure of your personal information: you have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.
- d) Right to restriction of processing or to object to processing: you have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.
- e) Right to data portability: You have the right to request us to provide you, or a third party with a copy of your personal data in a structured, commonly used machine readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- f) Right to withdraw consent: where our processing of your personal data is based on you having provided your consent, you have the right to withdraw consent.

9. Notification of Changes to our Privacy Policy

This privacy policy may change from time to time. Any changes will be communicated to our clients. where we have accurate contact details and where they would expect to receive communications from Resonate Leadership Ltd.

10. Contact Details and Further Information

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.





You also have the right to lodge a complaint with the Irish Data Protection Commission if you are not happy with the way we have used your information or addressed your rights. Details of how to lodge a complaint can be found at www.dataprotection.ie or you can call the Data Protection Commission at 353 (0)761 104 800.

Privacy policy Revision 1.3 effective from 11th September 2025.

CONTACT