



Privacy Statement

1 Who we are

Vodafone Group Services Limited is the controller of personal information processed in connection with the website <https://coachconnected.vflearning.com>. We are a member of the Vodafone Group and manage HR Learning & Development, including the processing of personal information about employees of Vodafone Group who want to coach and/or be coached by other employees of Vodafone Group.

Our registered office is Vodafone House, The Connection Newbury, Berkshire RG14 2FN. We are registered in England under company number 03802001. We are also registered with the Information Commissioner's Office (ICO), registration number Z802136X. We provide details of how to contact us in the 'How to contact us' section of this privacy statement.

2 Definitions

In this privacy statement:

- "we/us" means Vodafone Group Services Limited
- "third party" means someone who is not you or us or a part of Vodafone Group; and
- "Vodafone Group" means Vodafone Group Plc and any company or other organisation in which Vodafone Group Plc owns 50% or above of the share capital;
- "website" means <https://coachconnected.vflearning.com>.



3 The Basics

3.1 Personal information we process about you

3.1.1 Vodafone will process your personal information based on:

1. **Performance of contract**, when you create a user account to use the website as coachee respectively, if you want to use the website as a coach, when you request that a user account is created for you;
2. **Vodafone's legitimate business interest**, when creating anonymous statistics including, for example, number of coaches, number of coached employees and number coaching sessions, topic of coaching session from a pre-defined list and related Vodafone Spirit behaviours. We do this to monitor the impact of coaching and have view of the most requested topics to identify areas of focus for learning and development;
3. **Compliance with the law**, where certain information is necessary to satisfy a legal or regulatory requirement.

3.1.2 How we collect personal information about you

We collect personal information about you when you create a user account as a coachee or when you ask us to create a user account for you as a coach, when you complete your user profile and when you register interest to be coached in a certain topic.



The information we collect about you is required to provide you access to the website, to identify a suitable coach and coaches as well as for the performance of the coaching sessions. Should you not provide us with your name, your work email address and create a password, we will not be able to provide access to the platform. Likewise, if you do not provide the topics you want to be coached on / you are able to coach in, the languages you are able to coach in / be coached in and the timezone you are in you will not be able to use the website.

3.1.3 The types of information we may process about you are, for example:

1. **Personal details**, such as name, personal email address, if you are acting as a coach, also the languages you provide coaching in, the topics you coach on, the time zone you are located in and any other information you provide in the 'About Me' section of the website;
2. **Information about coaching sessions**, such as who you are coaching / coached by, information about the topic and date about past coaching sessions;
3. **Coaching feedback**, such as achievements to signify how a coach or person receiving coaching is approaching the coaching experience;
4. **Authentication information**, user name and password for the recruitment portal;
5. **Cookies**, such as strictly necessary and functionality cookies.



3.2 How we use information about you

We may process the personal information that we collect about you for the following purposes:

- **Creating a user profile**, so that you can use the website as a coach and/or to be coached;
- **Providing coaching**, if you register as a coach your name and bio will be shared with other users of the website who are looking to be coached on topics that you have selected to be coached on. If you accept the request of a user to provide coaching to them, your contact details may also be shared.
- **Receiving coaching**, if you register to receive coaching, the search details you select when searching for a coach will be shared with the coaches you select. When a coach accepts your request for coaching, your contact details may also be shared.
- **Coaching sessions**, when you receive a coaching session categorisation and short form details about the topics being discussed are stored for analytics purposes and to provide reminders to yourself and your coach for future coaching sessions;
- **Self-reflection and training**, the website also provides you access to use a "self-reflection" tool to work through the coaching model on your own and to training material on coaching;
- **Analytics**, we may use some of the personal information you provide to create anonymous statistics including, for example, number of coaches, number of coached



employees and number coaching sessions, topic of coaching session from a pre-defined list and related Vodafone Spirit behaviours;

- **Cookies**, we use cookies in particular to authenticate you and if selected by you to remember you as an authenticated user. For further details please see section '6 Cookie Policy' below.

3.3 Who we share information about you with

We may share personal information about you with:

- Other companies in the Vodafone Group, which will process your personal information solely and only, for the purposes in section 3.2;
- Third parties, such as IT service providers and others who help us to operate and maintain the website and resolving support cases. Where we use third parties, Vodafone ensures that they meet the same privacy and security standards as Vodafone;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

3.4 Where we process information about you



In doing the above, we may need to transfer personal information about you to other companies in the Vodafone Group or third parties located (or whose servers may be located) in countries outside of the country where you live and work, including countries outside of the European Economic Area (EEA). If we send personal information about you to a country that is not in the EEA, we will make sure that there is a legal basis for such transfer and that your personal information is adequately protected as required by applicable law, for example, by using standard agreements approved by relevant authorities and by requiring the use of other appropriate technical and organisational measures to protect your personal information.

Please contact us if you would like to find out more about the way we comply with our legal obligations in relation to international data transfers. Our contact details are available under section 8 'How to contact us' in this privacy statement.

3.5 How long we keep information about you

We will keep your information for as long as you are a registered user to the website.

If you have registered to the website as a coach, your user profile will be deleted when you leave Vodafone Group or upon your request.

If you have registered to the website to be coached, your user profile will be deleted after six months of inactivity.



We will anonymise information about coaching sessions six months after the respective coaching session took place.

4 Your rights

1. **Right to correct or update information:** you have the right to have information we keep about you corrected if it is not accurate. If you believe the information we process about you is inaccurate and needs updating, you can update your information in your user profile at any time. Should you not be able to correct or update your information this way, contact AskHRGroupUK@vodafone.com;
2. **Right to access:** Want a copy of the personal information we hold on you? You can apply for a copy of your personal information by contacting AskHRGroupUK@vodafone.com;
3. **Right to object:** you have the right to object to Vodafone processing your personal information for the purposes identified in section '3.2 How we use information about you'. You can make an objection request by contacting AskHRUK@vodafone.com;
4. **Right to deletion:** in certain circumstances you have the right to request that we erase the personal information we hold about you. You can request for your information to be deleted by contacting AskHRGroupUK@vodafone.com;
5. **Right to restrict use of your information:** if you feel the personal information we hold about you is inaccurate



or believe we shouldn't be processing your personal information, you may have the right to ask us to restrict processing that information. You can request to restrict processing by contacting AskHRGroupUK@vodafone.com;

6. **Right to data portability:** in certain circumstances you will have the right to take the personal information you have provided to us with you.

If we don't take action based on any of the above requests, we will inform you of the reasons why.

If you have a complaint, you can contact us at AskHRGroupUK@vodafone.com. We'll do our best to help but if you're still unhappy, you can contact the ICO, which is the UK data protection regulator – their details are at www.ico.org.uk.

6 Cookie Policy

This section is about what cookies and other tracking technologies are, how we use them and how you can manage them.

What are cookies?

Cookies are small files that are stored on your device when you visit a website. The cookies mean that the website will remember you and how you've used the site every time you come back.



If you want to know more about cookies, head to aboutcookies.org or allaboutcookies.org (please note: these links open a new window or browser tab).

What are other similar tracking technologies?

This refers to any other method used to store information, gain access to information, or track activities on your device, such as Local Shared Objects (“flash cookies”), scripts, tracking pixels and plugins, app trackers (including SDKs) on smartphones, tablets, smart TVs or other devices.

How we use cookies/tracking technologies

We use cookies and other similar tracking technologies to do a number of things. For example, remembering your preferences.

Cookies usually comprise of unique alphanumeric identifier that sits on your browser. In some cases, we won't be able to link the information we collect by using a cookie back to you. They can, however, enable us to link that information back to you and your personal information, for example, when you log in, or choose to register for a service.

We've put our cookies into the following categories, to make it easier for you to understand why we need them:

1. **Strictly necessary** – these are essential to make our website work efficiently and enable you to use our services and cannot be switched off
2. **Performance** – these are used to analyse the way our website works and how we can improve it



3. **Functionality** – these help to enhance your experience by doing things like remembering products you've added to your basket
4. **Targeting/advertising** – these are used to share some information with third parties who we advertise with, so we know how you've reached our website. We can also use cookies to identify the parts of the website you're interested in. We then use this information to show you adverts and pages we think may also be of interest to you, to tailor how we communicate with you, or to tailor the contents of the communications we send to you. If you prefer, you can opt out of these. Tailoring of content means it includes information reflecting the interest you've shown in the content of our web pages, or offers or promotions that we think may interest you, and to improve how we respond to your needs.

In addition to the cookies we use on our websites, we also use cookies and similar technologies in some emails we send to you. These help us to understand whether you have opened the email and how you have interacted with it. If you have enabled images, cookies may be set on your computer or mobile device. Cookies will also be set if you click on any link within the email.

We sometimes use persistent cookies as well as 'session-based' cookies. A 'persistent' cookie will remain for a period of time set for that cookie. A 'session-based' cookie is allocated



only for the duration of your visit to our website and automatically expires when you close down your browser.

Please also note that some cookies may be set by your browser, for example when you browse using Google Chrome. We don't control the use of browser cookies, so we suggest you check the browser's cookie policy to understand how those are used and how you can manage them.

First-party cookies

First-party cookies originate from the same domain as the website you're currently visiting (in this case, vodafone.co.uk).

See our list of first-party cookies (shown later on in this cookies policy).

Third-party cookies

Third-party cookies originate from a domain that's different to the website being visited.

What it's called	What it's used for	Type	Duration
First party cookies			
.ASPXAUTH	User authorisation session data for the site.	1	Session



__RequestVerificationToken	Security token used to avoid some types of cyber attacks.	1	Session
ARRAffinitySameSite	Used to make sure the visitor page requests are routed to the same server in any browsing session.	1	Session
ARRAffinity	Used for efficiently distributing incoming network traffic (load balancing).	1	Session
ASP.NET_SessionId	User non authorisation session data for the site.	1	Session
Third party cookies			
	There are no third-party cookies used by the website.		

Controlling your cookies

You can control how you use cookies in your browser or your device settings.

Information on controlling and deleting cookies is also available at <http://allaboutcookies.org>

7 Changes to this Privacy Statement



This privacy statement gets updated from time to time, so we'd encourage you to check it regularly.

8 How to contact us

If you have any further questions about this privacy statement or how we process your information, please contact us at AskHRGroupUK@vodafone.com.