

## Welcome to the Tuhura.ai Privacy Notice.

This document:

- Provides crucial details about us and our practices regarding the collection, storage, use, and sharing of your personal information, also known as "personal data."
- Outlines your rights concerning your personal data.
- Guides you on how to reach us or the appropriate regulatory body if you have any questions, concerns, or wish to exercise your rights; and
- Informs you about the process for lodging a complaint. If you're sharing someone else's personal information with us, either directly or indirectly, it's your responsibility to inform them about what you're sharing, why it's being shared, and to make them aware of this document. Please ensure you're authorized to share any personal information with us before doing so.

At the end of this document, you'll find a glossary intended to help you understand some of the terms used. We've attempted to define and link these terms throughout the document for easy reference. If anything is unclear, please get in touch with us.

It's important that you read this document along with any other privacy or processing policies we might provide, to fully understand our data use practices. This document complements, but does not replace, other notices and privacy policies.

### About Us

We Tuhura.ai, a cloud-based platform based in the UK, with registration details provided at our registered office address. References to "we," "our," "us," or "Tuhura.ai" refer to Tuhura.ai and its affiliates. Tuhura.ai only works organisations who are Insights Discovery partners. This may include Client Practitioners, Associate Practitioners, or Insight Distributors. This policy is aligned closely to the Insights privacy policy which we adhere to via its partners.

This document only covers the personal data handling practices of Tuhura. It does not cover the practices of third parties not owned or controlled by Insights, such as Direct Clients and/or Partners.

We have a designated Data Protection Officer (DPO) overseeing this document's inquiries. For any questions or to exercise your rights, please contact our DPO at [info@tuhura.ai](mailto:info@tuhura.ai).

### Updates to this Document and Your Responsibility

We aim to continuously refine our processes and regularly review this document. Past versions are available upon request.

This document may be updated periodically. When updates occur, we'll strive to notify you through our website, applications, and/or the email address you've provided. Please check our website regularly for updates that may concern you.

Ensuring we have accurate and current personal data about you is crucial. Please inform us of any changes to your personal data during your relationship with us. You can contact us anytime to update your personal data.

As we innovate and develop new products, it's important to stay informed about changes that may affect you.

### **Third Party Links and Customers**

Tuhura may directly provide you with products during events such as debriefs, workshops, or learning experiences.

Your employer or organization frequently sponsors individuals to become accredited in hosting and delivering Insights Events using Insights Products for you. If you participate in the Insights Discovery Evaluator or an Insights Event led by a coworker, it's likely that your employer has invested in their accreditation to offer Insights Products within your company. Insights refer to your employer or organization as their "Direct Client," and those accredited within your organization to use Insights products are "Client Practitioners."

Insights supplies these products to Client Practitioners for the purposes outlined in this notice. While Insights accredits these practitioners, they are employed by your employer and thus follow the directives of our Direct Client. If a Client Practitioner processes your personal data in a way not described in this notice, they must base their actions on legal grounds and provide you with a distinct privacy notice or statement for their processing activities. We advise you to review any privacy notices or statements provided to you.

Should you have concerns about how your personal data is handled by your employer in relation to Insights or Tuhura, we recommend contacting them before submitting any personal data to us.

Tuhura is not accountable for any processing conducted by the Direct Client, Accredited Practitioners, Administrators, Partners, or others, except as specified in this notice.

### **The Personal Data We Collect**

We primarily gather personal data directly from you when you engage with the Insights products or services, though sometimes we may receive information from third parties.

Our products are not designed for children, and we intentionally do not collect data from minors.

The types of personal data we collect can include various categories, which are detailed further in our documentation.

## **For Customers**

As a Customer, the types of personal data we may collect include:

- Identity details such as your full name, username or similar identifier, title, job title, role, and level of seniority;
- Contact information such as billing and delivery addresses, email address, and phone number;
- Financial information including details of bank accounts and payment cards;
- Details of transactions, including payments for our products and services;
- Technical information such as your IP address, login details, browser type and version, and other technologies on your devices used to access our services;
- Usage information detailing how you engage with our websites, products, and services;
- Data provided through forms on our website, Insights Online, Insights Connections, or by other means;
- Feedback on our products and/or services;
- Data provided when you contact us;
- Data provided when subscribing to our publications;
- Preferences regarding marketing from us, including your communication and cookie preferences, as well as your engagement with our marketing, such as click rates.

If you represent a Customer, we collect the aforementioned personal data as relevant to your involvement. For example, if you use a company card or account for purchases, or are involved in contract negotiations, we will process your identity and contact data accordingly.

We typically collect personal data under the following circumstances:

- Before, at the start, and during a contractual relationship when you inquire or purchase our services;
- During negotiations or at the beginning of a contractual service provision;
- When completing forms for our due diligence processes;
- When reporting issues to us;
- When interacting with our website or services, such as registration, subscriptions, postings, or other activities;
- When participating in our competitions or promotions;
- When contacting us with inquiries, feedback, or surveys;
- When conducting transactions or placing orders via our website, phone, or email;
- Upon visiting our premises where information provision is required.

For the purpose of this notice, "Customers" include both our Partners and Direct Clients.

For Participants

When participating in an Insights Discovery Evaluator, we collect personal data such as:

- Your full name and work email address;
- Your commonly used name and preferred language;
- Your preferred pronouns;
- Optional information such as country of residence, age range, job title, length of service, job level, sector, and sub-sector;
- Responses to our Insights Discovery Evaluator;
- Your Personal Profile, Colour Preferences, and Team Wheel.

Additional personal data may be collected directly from you through forms, feedback, or any correspondence via post, email, website, or otherwise.

### **The Insights Discovery Evaluation Process**

To generate unique offerings like the Personal Profile and Team Wheel, we collect personal data via a questionnaire, referred to as the "Insights Discovery Evaluator." This tool employs a straightforward color model for an easy-to-remember framework that assists individuals in comprehending their behavioral style, strengths, and their contributions to a team.

The Evaluator is composed of various statements. You'll assess how accurately these statements reflect you or your preferences. The Insights algorithm, which is the result of years of research and development, processes your responses to create a Personal Profile tailored specifically to you.

We store your responses to:

- Facilitate the reproduction of your Personal Profile should you request another copy or if needed for an Insights event you're attending;
- Update or recreate a Team Wheel when adding new team members or upon request for an existing one;
- Allow you to compare your responses over time and monitor your developmental progress;
- Enhance your self-awareness; and
- Support engagement by Insights Accredited Practitioners throughout your developmental journey.

This storage enables the full utilization of Insights Products by individuals through Insights Discovery Accredited Practitioners.

Insights Products, including your personal data, may be shared with Accredited Practitioners repeatedly and with more than one practitioner for the purpose of providing you with products in connection with Insights Events, which may include participants from different organizations.

### **Profiling and Opt-Out Information**

While Insights use your responses to generate a Personal Profile and Team Wheel, this process does not constitute 'profiling' as per data protection legislation, as it does not involve automated decision-making.

You're not required to provide personal data. If you prefer not to receive a Personal Profile, abstain from completing the Evaluator to prevent automatic generation. After a Personal Profile is generated, while we can delete our copies, we cannot control or delete copies held by your employer or any Insights Accredited Practitioners. It's crucial to request the deletion of your data from their systems as well.

You have the right to opt out of the Team Wheel. Opting out might affect your full participation in Insights Events. To opt out of the Team Wheel, contact us at [info@tuhura.ai](mailto:info@tuhura.ai) or inform your Accredited Practitioner.

Once part of a Team Wheel, your data may be shared within your team or organization. Although we can remove your data from future digital copies, existing hard or digital copies might not be modifiable. Promptly communicate your wish to opt out and request the deletion of existing Team Wheels where you're included from your employer or Practitioners.

Choosing not to provide personal data or opting out might limit or prevent access to our products/services or diminish their full benefits. However, providing personal data is entirely voluntary.

For Insights Accredited Practitioners and Administrators

For Accredited Practitioners and Administrators, we collect:

- Contact details, employment name, and personal data for creating an online account or interaction;
- Login and usage data for our platforms;
- Directly provided personal data, including feedback and communication;
- Employment details, including changes in your employment status;
- Shipping details for resources and merchandise;
- Accreditation details.

This information supports the delivery and improvement of our services and products.

### **Third-Party Data Collection**

We obtain personal data about you from a variety of third-party sources.

For Participants, this data may come from:

- Your employer or the organization that has enrolled you in an Insights Event or directed you to complete an Insights Discovery Evaluator;
- Insights Accredited Practitioners or Administrators who conduct and manage Insights Events or provide Insights Products (like the Personal Profile) to you;
- Partners who integrate Insights Products within their services and offerings to you.

For Customers, we may collect personal data from:

- Financial institutions or advisors, such as banks or building societies, especially if you're a named user on a corporate account, for which we'll seek consent if necessary;
- Credit reference agencies or due diligence providers, applicable mainly to company card or account holders used for our services (excluding credit checks on individuals except for sole traders);
- Your employer or organization, for example, if you're included in a business email chain or listed as a customer contact;
- Public sources like Companies House, LinkedIn, or your business website.

For Insights Accredited Practitioners, personal data may be sourced from:

- Your employer or the organization requesting your participation in an Insights Event or Evaluator;
- The Accredited Practitioner overseeing your session for accreditation confirmation and any other attended Insights Events;
- Other Accredited Practitioners, for instance, through public or tagged conversations on Insights Connections.

### **Technical Data Acquisition**

We also receive technical data indirectly from various sources, including:

- Analytics providers, like Google;
- Event organizers when you register for our events;
- Technical, payment, and delivery service providers;
- Data brokers or aggregators;

- Publicly available sources.

## **Website Visits and Personal Data**

Visiting our website doesn't inherently require personal data submission, though our cookies may gather some data per our Cookie Policy. Cookies are used in accordance with this policy, and settings can be adjusted in your browser to manage cookie preferences. Disabling cookies may affect website functionality.

Personal data collection occurs when you engage with our site to attend events, receive marketing, or express interest in our products/services. This includes data submitted through our "Ask Insights" chat and "Contact Us" functions.

### **Automated Data Collection**

Technical data about your device and browsing habits is automatically collected through cookies, server logs, and similar technologies as you navigate our website. This may include data from other sites using our cookies, detailed further in our Cookie Policy.

### **Aggregated Data**

We generate and use aggregated data (statistical or demographic) for various purposes, which doesn't directly identify you. Aggregated data may inform user engagement metrics or website usage analysis. If aggregated data is combined with personal data that can identify you, it is treated as personal data in line with this notice.

### **Special Category Data**

We generally do not collect sensitive personal data (concerning race, beliefs, health, etc.) or information about criminal convictions. If such data collection becomes necessary, we will inform you beforehand.

## **Use and Purpose of Personal Data**

We engage with your personal data strictly within legal grounds. Primarily, we handle your personal data under these conditions:

- To fulfill a contract we're initiating or have already established with you;
- When necessary for our legitimate interests or those of a third party, provided your rights and fundamental interests do not take precedence; and
- To adhere to legal requirements imposed upon us.

Although consent is not our primary basis for processing personal data, we may seek your consent for email or text message marketing. You can withdraw your consent at any time, and we will inform you of the withdrawal process at the time of consent. Withdrawal can also be initiated by email for your convenience.

For individuals in jurisdictions where consent is required for data processing, we will explicitly request your consent before collecting or using your personal data, unless consent can be

inferred from your actions or lack thereof. We take into account the sensitivity of the data, the purposes for collection, and your reasonable expectations when determining consent requirements. Consent will be sought for new processing purposes as necessary.

### **Customer Data Collection**

We collect personal data from our customers and business contacts primarily for:

- Delivery of products and services;
- Management and maintenance of contractual relationships;
- Account administration purposes;
- Compliance with legal and regulatory obligations, such as maintaining financial records; and
- To keep you informed about our products, services, events, and relevant updates.

### **Participant Data Collection**

For participants, we collect personal data mainly to:

- Produce Insights Products like the Personal Profile and Team Wheel;
- Enable Insights Accredited Practitioners to support your learning journey; and
- Deliver Insights Products to you, typically through Insights Accredited Practitioners in the context of an Insights Event. These practitioners are trained to use our products to aid in your self-awareness and development.

### **Data Collection from Insights Accredited Practitioners and Administrators**

For Insights Accredited Practitioners and Administrators, personal data is collected to:

- Maintain up-to-date accreditation records, including status and customer affiliations;
- Provide access to necessary materials and resources for facilitating and delivering Insights Events;
- Grant access to our secure systems, portals, or platforms for generating and accessing specific Insights Products required for conducting Insights Events;
- Invoice customers for accreditation and license fees associated with the Insights Accredited Practitioner license, typically covered by the customer nominating you for accreditation.



## **General Personal Data Processing**

We collect and process general personal data from individuals regardless of their role (Customer, business contact, Participant, Insights Accredited Practitioner, or Administrator) for various purposes, including:

- Updating and improving our internal processes and record-keeping;
- Ensuring compliance with our internal policies;
- Conducting research and gathering feedback on our products and services;
- Monitoring and ensuring our compliance with legal obligations and contractual agreements with Customers;
- Supporting our efforts to achieve accreditations, often using aggregated data;
- Analyzing statistical or demographic data;
- Assisting with audits, such as security reviews of our platforms;
- Responding to inquiries or correspondence from you;
- For marketing purposes.

## **Marketing Practices**

For Customers and Insights Accredited Practitioners, we may use your personal information to send updates and information about our products, services, promotions, and new offerings. This is often based on our legitimate interest, meaning we may not always require your consent. However, where consent is necessary, we will ask for it explicitly.

You can opt out of marketing communications anytime by:

- Emailing [info@tuhura.ai](mailto:info@tuhura.ai)

## **Selling Personal Data**

Tuhura does not sell personal data to third parties. We charge employers or organizations for our products and/or services but maintain the privacy of your data.

## **Data Sharing**

We share your personal data with various parties, including:

- Tuhura employees, contractors, and Accredited Practitioners who manage and facilitate Insights Events and have access to generate and access Personal Profiles and Team Wheels;
- Administrative staff involved in organizing Insights Events;

- Employers and organizations you may work for, to provide your Personal Profile or Team Wheel for the outlined purposes;
- Our Partners, when their offerings include our products;
- Service providers processing data on our behalf, under strict contracts to follow our directions;
- Other third parties as instructed by you, including potential business transfers or mergers;
- Insights group companies may also share data among themselves, protected by intragroup agreements.

We ensure all third parties adhere to strict data security and privacy laws. Access to your personal data is limited to those who need it for the specified purposes.

Your personal data may also be visible to other users on [tuhura.ai](https://tuhura.ai) and platforms Insights Connections, and may be shared with IT staff for support, professional advisers for consultancy services, and legal authorities like HM Revenue & Customs when required.

When using [tuhura.ai](https://tuhura.ai), the data in your profile, access to team wheels and Ai questions are only available when your account is set to public. By default your account is set to public but is only visible when you agree to the [Tuhura.ai](https://tuhura.ai) terms and conditions of use. You can set your account to private or delete your account at any time. For any support with this please contact us [info@tuhura.ai](mailto:info@tuhura.ai).

### **Storage of Your Personal Data**

We store your personal data in our Linode servers, as well as on the premises of our group companies, third-party agencies, partners, and service providers as mentioned previously. It's important to note that some of these entities may be located outside the European Economic Area (EEA) or your current location.

### **International Data Transfers**

In order to provide you with our services, we may need to transfer your personal data outside of your home country, the UK, or the EEA. This could include transfers to:

- Our group companies or offices abroad;
- Our service providers;
- Our customers;
- Our accredited practitioners;
- Our partners;
- Or back to your location if our servers are based in the UK/EEA but you are located elsewhere.

We ensure these international data transfers are carried out securely and in compliance with legal requirements, employing necessary safeguards.

### **Data Security Measures**

We have implemented robust security measures to protect your personal data from accidental loss, unauthorized access or use, modification, or disclosure. Access to your personal data is strictly limited to those who require it for their work, and they are bound by confidentiality obligations.

In case of a personal data breach, we have procedures in place to address it promptly and will inform you and the relevant authorities as required by law.

### **Retention of Your Personal Data**

Your personal data will be retained only for the period necessary to fulfill the purposes for which it was collected, including for meeting any legal, regulatory, tax, accounting, or reporting obligations. The retention period may be extended if we face a complaint or anticipate litigation.

The criteria used to determine data retention periods include the volume, nature, and sensitivity of the data, the risk of harm from unauthorized disclosure, the processing purposes and if they can be achieved by other means, and applicable legal requirements.

You have the right to request deletion of your personal data at any time by contacting us at [info@tuhura.ai](mailto:info@tuhura.ai)

### **Resolving Concerns and Filing Complaints**

We aim to address any concerns or issues you might have regarding our use of your information. Nonetheless, you are entitled to file a complaint with a regulatory authority, especially in the European Union (EU) or European Economic Area (EEA) state where you reside, work, or where an alleged breach of data protection laws has taken place.

In the UK, the Information Commissioner's Office (ICO) can be reached online at <https://ico.org.uk/concerns> or by phone at 0303 123 1113, regardless of your location.

For authorities in the EEA, Switzerland, and certain non-European countries (including the US and Canada), further information can be found [here](#).

#### **Contacting Us**

For any inquiries, please reach out to our Data Protection Officer via email, mail, or phone at:

Email: [info@tuhura.ai](mailto:info@tuhura.ai)

## Glossary

- **Administrator:** An individual granted access to tuhura.ai admin to support an Insights Accredited Practitioner in managing their account and delivering specified Insights products.
- **Colour Preferences:** Your profile's color preferences aim to enhance understanding of your interaction and communication with others, representing a mix of color energies fundamental to self-awareness. While you may lean towards a specific color, we embody all energies and can adjust as needed. Color preferences describe, not define, you and are fluid, not fixed.
- **Comply with a legal obligation:** This involves processing your personal data where it's necessary to meet a legal or regulatory requirement.
- **Customer:** Refers to any client of tuhura.ai, whether a direct client or a partner.
- **Direct Client:** A customer that purchases Insights Products for internal use, possibly including internal client practitioners accredited to deliver these products.
- **Insights Accredited Practitioner:** A professional certified by Insights to administer and deliver one or more specific Insights Products, potentially as an Insights or client employee, or as a partner or distributor consultant.
- **Insights Discovery Evaluator:** A psychometric tool by Insights for creating Insights Products, involving statement rankings by participants to generate personalized profiles and team wheels.
- **Insights Event:** Any workshop, seminar, or learning event that incorporates Insights Products.
- **Insights Online:** An online platform for accessing the Insights Discovery Evaluator and for authorized users to access Insights Products.
- **Insights Products:** Services and products developed, owned, or licensed by Insights, including personalized profiles and team wheels.
- **Participant:** Individuals receiving Insights Products or attending an Insights Event.
- **Partner:** Customers incorporating Insights Products into their own offerings, sometimes referred to as "Distributors".
- **Personal Profile:** A detailed report generated from the Insights Discovery Evaluator, designed to enhance self-awareness and support learning or coaching experiences.
- **Team Wheel:** A chart that maps out team members' color preferences from their Personal Profiles, facilitating better understanding and communication within the team.
- **Ai Questions.** Questions formulated on tuhura.ai using the open ai system Chat GPT. Questions and responses are based on the users Insights Profile.