

PAGODA ENTERPRISES LTD – PRIVACY NOTICE

Last updated: July 2026

Pagoda Enterprises Ltd ("**Pagoda**", "**we**", "**us**" or "**our**") is committed to protecting your personal data and respecting your privacy. This Privacy Notice explains what personal data we collect, how we use it, the lawful bases we rely upon, who we share it with, how long we retain it and your rights under the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018.

This Privacy Notice applies to all personal data collected through our website (**<http://pagoda.academy>**), our Programmes and Services, our online learning platform, coaching sessions, events, communications, sales, marketing activities and any other interactions you have with Pagoda.

This Privacy Notice should be read alongside our Standard Terms and Conditions, Client Code of Conduct and any Programme-specific agreement that applies to your Services.

Please read this Privacy Notice carefully before using our Website or engaging our Services.

1. Who we are and how to contact us

The data controller responsible for your personal data is:

Pagoda Enterprises Ltd

Registered in England and Wales (Company No. 13113228)

Registered office:

12 International House

Constance Street

London

E16 2DQ

Email:

jarrod@pagoda.academy

Pagoda Enterprises Ltd is the controller of your personal data for the purposes of UK GDPR.

We are not currently required to appoint a Data Protection Officer. If you have any questions about this Privacy Notice or wish to exercise your legal rights, please contact us using the details above. We aim to respond within one calendar month.

2. What personal data we collect

We collect personal data:

- that you provide directly to us;
- that is created during the delivery of our Services;
- that is collected automatically when you use our Website or online platforms; and
- that is generated where you ask us to assist you with applications or similar activities.

The personal data we collect depends upon the nature of your relationship with Pagoda and the Services you receive.

Information you provide to us

When you contact us, submit an enquiry, purchase or otherwise engage our Services, we may collect personal data including:

- full name;
- email address;
- telephone number;
- postal address (where relevant);
- school, university or employer details;
- educational history and qualifications;
- career interests, aspirations and goals;
- CVs, cover letters, application forms, personal statements and supporting documents;
- interview responses, assessment centre exercises and written work;
- information relating to internships, graduate programmes or other applications;
- communications between you and Pagoda (including emails, text messages and messages sent through messaging platforms);
- information relating to your attendance at coaching sessions;
- accessibility requirements, disabilities, neurodiversity, health information or other sensitive personal information that you voluntarily choose to share where reasonably necessary to enable us to provide appropriate support, coaching or reasonable adjustment;
- payment and billing information (where applicable); and
- any other information you voluntarily provide to us.

We recognise that some of the information you choose to share with us, such as information relating to your health, disability, neurodiversity or accessibility requirements, may constitute special category personal data under UK GDPR.

We will only process this information where you have chosen to provide it to us and where it is reasonably necessary to deliver our Services, make appropriate adjustments, protect your interests or otherwise comply with applicable law. We ask that you do not provide more sensitive personal information than is reasonably necessary for us to support you.

Please ensure that the personal data you provide is accurate, complete and kept up to date. Please notify us if your details change during your Programme.

Coaching notes

As part of delivering our Services, members of Pagoda Personnel may create coaching notes during or after coaching sessions.

These notes may include:

- agreed action points;
- feedback;
- development areas;
- application progress;
- interview preparation;
- coaching observations; and
- other information reasonably necessary to provide our Services.

These notes form part of your client record.

Coaching session recordings

Pagoda may record online coaching sessions, workshops, webinars and other virtual meetings delivered as part of our Services.

Recordings may include:

- your image;
- your voice;
- your display name;
- questions and comments you make during the session;
- screen sharing;
- documents displayed during the session; and
- any personal information you choose to discuss.

We record sessions for purposes including:

- learning revision materials;
- maintaining an accurate record of coaching provided;
- quality assurance;
- supervision and training of Personnel;
- safeguarding;
- resolving complaints or disputes;
- ensuring consistency of our Services; and
- improving the quality of our Programmes.

We will not use coaching session recordings for advertising, promotional or marketing purposes without your separate consent.

Client-authorised access to third-party accounts

As part of our Services, you may ask Pagoda to review or assist with an application submitted through a third-party platform, such as a university application portal, employer recruitment portal, scholarship application system or similar online service.

Such requests may be made by email, text message, WhatsApp, WeChat, LinkedIn, Slack or another communication channel ordinarily used between you and Pagoda.

Where you expressly request this assistance, you may choose to authorise Pagoda to access the relevant account by:

- providing temporary login credentials;
- sharing access during a live coaching session;
- granting delegated access where supported by the platform; or
- another method chosen by you.

Where this occurs:

- we will only access the account for the purpose you have requested;
- we will only access information reasonably necessary to provide the requested assistance;
- we will not use the account for any unrelated purpose;
- we will cease accessing the account once the requested assistance has been completed; and
- we will not retain login credentials longer than reasonably necessary unless there is a legitimate legal or operational reason to do so.

You remain responsible for ensuring that you are authorised to grant such access and that doing so complies with the terms and conditions of the relevant third-party platform.

Information collected automatically

When you visit our Website or use our online platforms, we may automatically collect limited technical information including:

- IP address;
- browser type and version;
- operating system;
- device type;
- pages viewed;
- date and time of access;
- referring website;
- diagnostic information; and
- Website usage data.

This information is used to:

- maintain Website security;
- improve Website performance;
- understand how our Website is used;
- diagnose technical issues; and
- produce aggregated analytics.

We do not use this information to build individual behavioural profiles.

3. Lawful bases for processing

UK GDPR requires us to have a lawful basis before processing your personal data.

Depending upon the circumstances, we rely upon one or more of the following lawful bases.

Performance of a contract (Article 6(1)(b))

Where you engage Pagoda to provide coaching, mentoring, educational advisory or related Services, we process your personal data because it is necessary to:

- deliver the Services;
- administer your Programme;
- communicate with you;
- provide coaching and feedback;
- maintain coaching records;
- review application materials;
- arrange coaching sessions;
- process payments; and
- otherwise perform our contractual obligations.

Legitimate interests (Article 6(1)(f))

We process certain personal data where necessary for our legitimate interests, provided those interests are not overridden by your rights and freedoms.

These interests include:

- operating and improving our Website;
- responding to enquiries;
- administering our business;
- improving the quality of our Services;
- supervising and training Personnel;
- recording coaching sessions for quality assurance and dispute resolution;
- protecting our legal rights;
- preventing fraud or misuse of our Services; and
- maintaining appropriate business records.

We have considered these legitimate interests carefully and believe they are proportionate and compatible with your rights.

You may object to processing carried out on this basis at any time.

Compliance with legal obligations (Article 6(1)(c))

We process personal data where necessary to comply with our legal obligations, including obligations relating to taxation, accounting, regulatory requirements, safeguarding and legal proceedings.

Consent (Article 6(1)(a))

In limited circumstances, we rely on your consent.

For example, we may ask for your consent before:

- sending optional marketing communications;
- using testimonials together with identifiable personal information;
- using coaching session recordings for promotional purposes; or
- carrying out other processing where consent is required by law.

Where processing is based on consent, you may withdraw that consent at any time. This will not affect the lawfulness of processing carried out before consent was withdrawn.

4. How we use your personal data

We use the personal data we hold to:

- provide coaching, mentoring and educational advisory Services;
- deliver our Programmes;
- review CVs, cover letters, applications and supporting documents;
- provide interview preparation and assessment centre feedback;
- administer your Programme;
- schedule coaching sessions;
- communicate with you regarding your Services;
- maintain coaching records;
- record online coaching sessions for quality assurance, safeguarding, supervision, dispute resolution and service improvement;
- enable continuity where another member of Pagoda Personnel assists with your Programme;
- respond to enquiries and support requests;
- process invoices and payments;
- operate, secure and improve our Website;
- monitor usage of our online learning platform;
- comply with legal and regulatory obligations;
- establish, exercise or defend legal claims; and
- otherwise manage and improve our business.

We do not carry out automated decision-making or profiling that produces legal or similarly significant effects.

5. Who we share your personal data with

We only share your personal data where reasonably necessary to provide our Services, comply with legal obligations or protect our legitimate interests. We do not sell your personal data or allow third parties to use it for their own marketing purposes.

We may share your personal data with the following categories of recipients.

Pagoda Personnel

Your personal data may be shared with members of Pagoda Personnel where reasonably necessary to deliver your Programme or administer our Services.

This may include:

- coaches;
- mentors;
- educational advisers;
- consultants;
- contractors;
- administrative staff; and
- senior management.

Personnel are only given access to the information reasonably necessary for their role and are subject to appropriate confidentiality obligations.

Service providers and processors

We use carefully selected third-party providers to support our business operations.

These may include providers of:

- website hosting;
- cloud storage;
- email services;
- online learning platforms;
- video conferencing;
- scheduling software;
- payment processing;
- customer relationship management systems;
- document storage;
- accounting software; and
- IT support.

Where these providers process personal data on our behalf, they act only on our documented instructions and are required to implement appropriate security measures in accordance with UK GDPR.

Professional advisers

We may share information with our professional advisers where reasonably necessary, including:

- solicitors;
- accountants;
- auditors;
- insurers; and
- other professional advisers.

Regulatory bodies and law enforcement

We may disclose personal data where required:

- by law;
- by a court order;
- by a regulator;
- in connection with legal proceedings;
- to establish, exercise or defend legal claims; or
- where otherwise permitted by applicable law.

Business transfers

If Pagoda undergoes a merger, acquisition, restructuring or sale of all or part of its business, personal data may be transferred as part of that transaction.

Where reasonably practicable, we will notify affected individuals before any such transfer takes effect.

International transfers

Some of our service providers may process personal data outside the United Kingdom.

Where this occurs, we will ensure appropriate safeguards are in place before any transfer takes place. These safeguards may include:

- UK adequacy regulations;
- the UK International Data Transfer Agreement (IDTA);
- the UK Addendum to the European Commission's Standard Contractual Clauses; or
- another lawful transfer mechanism recognised under UK GDPR.

Artificial intelligence tools

To improve the efficiency and quality of our administrative and coaching support, Pagoda may use artificial intelligence ("AI") tools to assist with activities such as:

- proofreading;
- drafting;
- summarising coaching notes;
- reviewing application materials;
- organising information;
- preparing internal documents; and
- improving administrative workflows.

Where AI tools are used:

- we take reasonable steps to avoid including unnecessary personal data;
- we seek to use business-appropriate AI providers with suitable security measures;
- AI-generated outputs are reviewed by a member of Pagoda Personnel before being relied upon; and
- AI is not used as the sole basis for decisions that produce legal or similarly significant effects for clients.

6. Cookies and similar technologies

Our Website uses cookies and similar technologies to operate effectively and improve your browsing experience.

Some cookies are strictly necessary for the operation of the Website and do not require your consent.

Where required by law, we will request your consent before placing non-essential cookies, including analytics or preference cookies.

You can manage or disable cookies through your browser settings at any time.

Please note that disabling certain cookies may affect the functionality of our Website.

Further information about cookies can be found at:

www.allaboutcookies.org

7. How long we keep your personal data

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected or to comply with our legal obligations.

Our standard retention periods include:

Client records

(including contact details, coaching history and Programme administration)

Up to **6 years** following the end of the client relationship.

Coaching notes

Retained as part of the client record for up to **6 years** after the end of the client relationship.

Coaching session recordings

Ordinarily retained for up to **2 years** following the end of the client relationship.

Recordings may be retained for longer where reasonably necessary in connection with:

- complaints;
- legal proceedings;
- safeguarding;
- regulatory obligations; or
- ongoing disputes.

Application materials

Including CVs, cover letters, application forms and interview preparation documents.

Normally retained as part of the client record for up to **6 years**.

Temporary login credentials or delegated account access

Where you authorise Pagoda to access a third-party account, any temporary credentials or equivalent access information will be securely deleted or destroyed as soon as reasonably practicable after the requested assistance has been completed unless a longer retention period is required by law or is reasonably necessary in connection with an ongoing matter.

Enquiries that do not become clients

Up to **2 years** from the date of the enquiry.

Financial records

Retained for **6 years** in accordance with HMRC requirements and applicable legislation.

Website technical and log data

Ordinarily retained for up to **12 months** before deletion or anonymisation.

Where we no longer have a legitimate reason to retain your personal data, we will securely delete or anonymise it.

Where immediate deletion is not reasonably possible (for example because information is held within secure backups), we will isolate the information from further processing until deletion takes place.

8. How we keep your personal data secure

We implement appropriate technical and organisational measures designed to protect your personal data against accidental loss, unauthorised access, disclosure, alteration or destruction.

These measures include, where appropriate:

- encrypted transmission of data using HTTPS/TLS;
- access controls limiting information to authorised Personnel;
- password-protected systems;
- secure cloud storage;
- staff training;

- confidentiality obligations;
- regular reviews of our information security practices; and
- appropriate contractual protections with our service providers.

Where you voluntarily authorise Pagoda to access a third-party account for the purpose of reviewing an application or providing coaching support, we will take reasonable steps to protect any credentials or access information provided, restrict access to authorised Personnel and avoid retaining that information longer than reasonably necessary.

No method of electronic transmission or storage is completely secure. While we take reasonable steps to protect your information, we cannot guarantee absolute security.

If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner's Office ("ICO") within the time required by law and, where required, notify affected individuals.

9. Your rights

Under UK GDPR and the Data Protection Act 2018, you have a number of rights regarding your personal data.

These include the right to:

- request access to your personal data;
- request correction of inaccurate or incomplete personal data;
- request deletion of personal data where applicable;
- request restriction of processing in certain circumstances;
- receive certain personal data in a structured, commonly used and machine-readable format;
- object to processing based upon legitimate interests;
- object to direct marketing;
- withdraw consent where processing relies upon consent; and
- not be subject to decisions based solely upon automated processing that produce legal or similarly significant effects.

To exercise any of these rights, please contact:

jarrod@pagoda.academy

We normally respond within one calendar month.

Where permitted by law, we may extend this period by up to two additional months for particularly complex requests.

We will not normally charge a fee unless a request is manifestly unfounded, excessive or repetitive.

10. Complaints

If you have any concerns about the way Pagoda handles your personal data, we encourage you to contact us first so that we have the opportunity to resolve the issue.

Please contact:

jarrod@pagoda.academy

You also have the right to lodge a complaint with the Information Commissioner's Office.

Information Commissioner's Office

Website:

www.ico.org.uk/make-a-complaint

Telephone:

0303 123 1113

Address:

Wycliffe House

Water Lane

Wilmslow

SK9 5AF

Nothing in this Privacy Notice affects your right to seek a judicial remedy through the courts where available under applicable law.

11. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in:

- our Services;
- our business operations;
- applicable legislation;
- regulatory guidance; or
- developments in data protection law.

The "Last updated" date at the top of this Privacy Notice will be amended whenever a material change is made.

Where changes are significant, we will take reasonable steps to bring them to your attention, for example by publishing a prominent notice on our Website or contacting existing clients where appropriate.

We encourage you to review this Privacy Notice periodically so that you remain informed about how we collect, use and protect your personal data.