

# General Data Protection Regulation Privacy Policy

## 1. Introduction and Scope

Tuff Leadership Training ("Tuff") is a global provider of leadership development and organisational shift interventions. While our Group headquarters is located in Sweden, our popularity and impact have led to a global presence, with established operations in the UK, Spain, and Moldova.

This policy describes how **Tuff Ledarskapsträning Stockholm AB** and **Tuff Leadership Training UK Ltd** (together referred to as "the Group" or "Tuff") collect, process, share, and secure personal information. We are committed to transparency and the protection of individual privacy rights in accordance with the **General Data Protection Regulation (GDPR) Regulation (EU) 2016/679**.

## 2. Data Collection: What We Collect

To provide our specialised training and coaching services, Tuff processes personal information relating to our participants and partners. Our records derive from information collected directly from you and typically include:

- **Contact Details:** Name, surname, e-mail address, and telephone number.
- **Professional Information:** Company name, billing address, and billing history.
- **Engagement History:** A record of our contacts, e-mail conversations, and notes related to meetings or training sessions.
- **Feedback and Testimonials:** Reviews and comments regarding our training programmes.

## 3. Data Storage and Security

All personal information is maintained on secure Tuff systems, accessible only to authorised employees and consultants within the Group. We utilise a "Privacy by Design" approach, ensuring that we only hold data absolutely necessary for the completion of our duties.

Your data is stored within the following licensed software environments, all of which are protected by periodically updated passwords:

1. **LIME (CRM):** For managing our relationship and contact history.
2. **Fortnox:** For secure billing and accounting.
3. **Office 365:** For e-mail and professional communication.

## 4. Data Usage: Why We Hold Your Information

Tuff holds and uses personal information for the following specific business purposes:

- **Service Delivery:** To contact you regarding logistics and content for the training programmes in which you are participating.

- **Continuous Development:** Our training often reveals that leadership development is an ongoing journey. We hold information to update you on scheduled events, seminars, and new training dates that support your future leadership ambitions.
- **Consent and Relevance:** Information is gathered when you participate in our events or subscribe to our newsletters. We retain this data only as long as the purpose is relevant. You may unsubscribe at any time, and we will erase your information upon request.

## 5. Transfer and Sharing of Information

The recipients of your personal information are secure cloud-based systems. We are committed to protecting your data and ensure that our technical, organisational, and legal measures are robust.

- **Internal Transfer:** Data is transferred internally between our core systems (LIME, Fortnox, and Office 365) to ensure seamless service.
- **Third Parties:** We do not sell your information to third parties. We ensure that all partners and subcontractors are committed to protecting your information and use it only for compatible purposes.

## 6. Your Rights as a Data Subject

Under the GDPR, you have significant rights regarding your personal data:

- **Right to Access:** You may obtain confirmation as to whether your data is being processed and receive a copy of that data in a free, electronic format.
- **Right to be Forgotten (Erasure):** You have the right to request that we erase your data and cease further dissemination if it is no longer relevant to the original purpose or if you withdraw consent.
- **Data Portability:** You may receive your data in a machine-readable format to transmit it to another controller.
- **Right to Object:** You may object to the processing of your data for direct marketing or profiling. Upon objection, Tuff must stop processing your data for these purposes immediately.
- **Right to Rectification:** You have the right to request that we rectify or remove specific records from our systems.

## 7. Breach Notification

In accordance with mandatory GDPR requirements, Tuff will notify the relevant supervisory authority of any data breach likely to "result in a risk for the rights and freedoms of individuals" within **72 hours** of discovery. We are also committed to notifying our clients and affected data subjects without undue delay.

## 8. Accountability and Contact

At Tuff, privacy responsibility is shared across our self-governing model. Carl Erik Herlitz and Trevor Hudson act as lead custodians for our operational plans, ensuring these standards are upheld.

If you have questions regarding this policy or wish to exercise your rights, please contact us:

**Email:** [info@tuffleadershiptraining.com](mailto:info@tuffleadershiptraining.com)

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**Policy Review:** This policy is kept under regular review to remain aligned with current best practices.

**Last Updated:** January 2026.