



AhaMo™ customer privacy notice

Registered name: **AhaMo™ Group Limited**

We are the controller of your personal data. For more information on controllers and their responsibilities please see ICO guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

- Email Fiona@ahamo.co.uk

What information we collect, use, and why

We collect or use the following information to provide and improve products and services for clients:

- Names and contact details
- Gender
- Occupation
- Date of birth
- Company Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Photographs and Video recordings of key events and with explicit permission
- Records of meetings and decisions made



We collect or use the following personal information for the operation of client or customer accounts:

- Names and contact details
- Purchase or service history
- Account information, including registration details

We collect or use the following personal information for information updates or marketing purposes:

- Names and contact details

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- Your right of access – You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- Your right to rectification – You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- Your right to erasure – You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)



- Your right to restriction of processing – You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- Your right to object to processing – You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- Your right to data portability – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about data portability.](#)
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and, in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide and improve products and services for clients are:

- Consent – we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter into or carry out a contract with you. All your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, your organisation or someone else, without causing an undue risk of harm to anyone. All your data protection



rights may apply, except the right to portability. Our legitimate interests are:

- We are a learning and development consultancy. As part of an agreed contract with an individual's employer, we collect personal data solely for the purpose of supporting the individual and their organisation to improve performance, enhance collaboration, and achieve development goals. This data is processed under our legitimate interest in delivering effective learning and development services, and in alignment with the expectations of the employer and the individual.

For more information on our use of legitimate interests on a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the operation of client or customer accounts are:

- Consent – we have permission from you after we give you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we must collect or use the information so we can enter or carry out a contract with you. All your data protection rights may apply except the right to object.
- Legitimate interests – we're collecting or using your information because it benefits you, your organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We rely on the lawful basis of legitimate interests and, where applicable, contractual necessity to collect and use personal information for the operation of client accounts. Specifically, we process personal data to: Deliver agreed learning and development services to individuals and their employers Manage bookings, communications, and reporting Ensure the effectiveness and relevance of our programmes. This processing is necessary to fulfil our contractual obligations to clients and to



support individuals and organisations in achieving performance and development outcomes. We ensure that data is handled securely, proportionately, and in line with the expectations of both the client and the data subjects

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for information updates or marketing purposes are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - For information updates and marketing purposes, we rely primarily on consent. We only send communications to individuals who have given us clear permission after being provided with all relevant information about how their data will be used. In some cases, we may rely on legitimate interests, where the communication is relevant to an existing client relationship and does not override the individual’s rights or interests. Individuals always have the right to opt out of marketing communications at any time, and we ensure that all communications include clear unsubscribe options.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you



How long we keep information?

AhaMo Data Retention Policy

We are committed to retaining personal data only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, contractual, and operational obligations. This policy outlines how long we retain different categories of data and the rationale behind those timeframes.

1. Learner and Participant Data

- Retention Period: 3 years from the date of last engagement
- Purpose: To support follow-up development, reporting, and evaluation of learning outcomes
- Includes: Names, contact details, assessment results, feedback, attendance records

2. 360 Feedback and Assessment Data

- Retention Period: 2 years from completion
- Purpose: To allow for longitudinal analysis and follow-up development planning
- Includes: Feedback responses, ratings, summaries, and reports

3. Client and Contractual Data

- Retention Period: 6 years from contract end (to align with UK statutory limitation periods)
- Purpose: Legal and financial record-keeping
- Includes: Contracts, invoices, correspondence

4. Marketing and Communications Data

- Retention Period: Until consent is withdrawn or 2 years of inactivity
- Purpose: To manage potential mailing lists and engagement tracking
- Includes: Email addresses, preferences, engagement history

5. Website and Analytics Data

- Retention Period: 26 months (Google Analytics default)
- Purpose: To monitor usage and improve services



- Includes: Cookies, IP addresses, usage patterns

Data Disposal and Review

All personal data is securely deleted or anonymised once the retention period expires. AhaMo conducts annual reviews of stored data to ensure compliance and relevance. Where data is retained longer for research or statistical purposes, it is anonymised to remove personal identifiers.

Who do we share information with?

Data processors

AhaMo engages with a range of third-party service providers who act as data processors, supporting the delivery and administration of our learning and development services. These processors handle personal data on our behalf, strictly under our instructions and for specific purposes related to learning and development.

Their roles include facilitating online coaching, collecting feedback, managing participant data, and supporting programme evaluation. They may provide platforms for hosting learning content, sending communications, or analysing engagement and outcomes.

While they process data, they do not determine how or why it is used — that responsibility remains with AhaMo as the data controller.

Each processor is contractually bound to uphold data protection standards, including confidentiality, security, and compliance with applicable laws such as the UK GDPR. AhaMo ensures that all processors implement appropriate safeguards and only process data necessary to fulfil their role in supporting our learning and development programmes.

These processors include:

- **Video Conferencing Platforms** – e.g. Microsoft Teams, used to deliver virtual sessions



- **HR and Talent Platforms** – used to manage participant data and development journeys
- **Email and Communication Tools** – for sending updates, invitations, and feedback requests
- **Cloud Storage Providers** – for securely storing programme materials and participant data
- **Relevant Associates (MoMakers™)** – independent contractors engaged by AhaMo who deliver services on our behalf and operate under strict data processing agreements

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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