

PRGRSS PRIVACY AND DATA PROTECTION POLICY

Global Purpose UK Limited
Company Number: 13667768

Version: 3

Last updated: 14 July 2026

In short

PRGRSS is operated by Global Purpose UK Limited.

This policy explains what personal information we collect about you, why we collect it, how we use and protect it, who we may share it with, and the rights you have over your information.

For any questions about this policy or how we use your personal information, contact us at hello@thisisprgrss.com.

PART A — YOUR PRIVACY

1. Who we are

PRGRSS is a mentoring service for young adults, operated by Global Purpose UK Limited.

Throughout this policy, Global Purpose UK Limited may be referred to as “**we**,” “**us**,” “**our**,” or “**PRGRSS**.”

Global Purpose UK Limited is the data controller. This means we are responsible for deciding how and why your personal information is collected and used.

Registered office:

Soho Works
180 Strand
London
WC2R 1EA

Data Protection Lead: Shelley Eades

Privacy, data protection, general enquiries, support and safeguarding concerns:
hello@thisisprgrss.com

You must be aged between 18 and 30 to use PRGRSS as a mentee.

2. The information we collect

We collect personal information when you create an account, build your profile, use the PRGRSS platform, participate in mentoring or engage with our programmes.

Account and identity information

We may collect:

- Your name.
- Your profile photograph.
- Your email address.
- Your password and login information.
- Your date of birth.
- Your country or location.
- Your account status.

Eligibility and matching information

We may collect:

- Whether you are joining PRGRSS as a mentor or mentee.
- A corporate partner or programme code, where applicable.
- The career fields or industries you are interested in.
- The skills you want to develop.
- The questions or areas in which you want support.
- Information about your education, qualifications or experience.
- For mentors, information about your professional background and experience.

Diversity information

We may ask whether you identify as being from a diverse or underrepresented background. This could include information relating to:

- Ethnic background.
- Socio-economic background.

- Disability.
- Neurodiversity.
- Other personal circumstances relevant to programme impact or accessibility.

Providing this information is optional. Additional information about how we protect this data is set out in Section 4.

Information collected when you use PRGRSS

We may collect:

- Mentoring sessions booked, completed, cancelled or missed.
- Call credits and membership usage.
- Messages sent through the PRGRSS platform.
- Feedback, ratings and reviews.
- Records of participation in events, programmes or activities.
- Membership and subscription status.
- Information relating to safeguarding reports or concerns.
- Communications between you and PRGRSS.

Payments may be processed through the Apple App Store, Google Play, Stripe or another authorised payment provider.

PRGRSS does not directly store full payment-card information where payments are processed by an external payment provider.

Technical information

We automatically collect certain technical information to help operate, secure and improve the PRGRSS platform.

This may include:

- Your IP address.
- Your device type and model.
- Your operating system and version.
- The version of the PRGRSS app or website you are using.
- Login and security information.
- Crash reports and error logs.
- App performance information.
- Basic usage information, such as which features or screens are used.
- Information about how quickly pages or features load.

We use this information to maintain the service, investigate technical problems, improve

performance and protect user accounts.

Account approval

New accounts may be reviewed before full access is granted.

You may be placed on a waiting list while your account is reviewed, verified or approved.

We may retain information relating to your application, verification and approval status.

3. How we check age

We ask for your date of birth when you register.

We use this information to:

- Confirm that you are eligible to use the relevant PRGRSS service.
- Confirm that mentees are aged between 18 and 30.
- Apply any age-related membership or programme requirements.
- Help maintain a safe and appropriate platform.

We do not knowingly allow anyone under the age of 18 to create a mentee account.

Where we become aware that an account has been created by someone under 18, we may suspend or close the account and delete the associated information where appropriate.

4. Diversity information and special category data

Some personal information is treated as special category data under UK data protection law.

This may include information relating to ethnic background, disability, health or neurodiversity.

Where we collect special category data:

- Providing it will normally be optional.
- We will explain why we are requesting it.
- We will normally rely on your explicit consent.
- You can use PRGRSS without providing optional diversity information.
- We will apply additional protection to this information.
- We may use it to understand whether our programmes are reaching the communities they are designed to support.
- We may use it to make reasonable adjustments or provide appropriate support.
- We may use it to measure and report our social impact.

- Reports will normally be aggregated or anonymised so that individuals cannot be identified.
- It will not be used to determine your price or unfairly restrict your access to PRGRSS.
- It will not be used to make solely automated decisions about you.
- It will not be shared in a form that identifies you unless you have agreed or there is another lawful reason to do so.

You may withdraw your consent or ask us to delete optional diversity information by emailing hello@thisisprgrss.com.

5. How we use your information

We may use your personal information to:

- Create, verify, approve and manage your account.
- Provide access to PRGRSS services.
- Match mentees with suitable mentors.
- Allow mentors and mentees to book and complete sessions.
- Manage memberships, subscriptions and call credits.
- Confirm eligibility and age requirements.
- Communicate with you about your account or participation.
- Send reminders about mentoring sessions, events or programmes.
- Provide customer support.
- Respond to enquiries, complaints or requests.
- Investigate and respond to safeguarding concerns.
- Maintain appropriate records of mentoring activity.
- Keep the platform secure.
- Detect or prevent misuse, fraud or inappropriate behaviour.
- Improve the PRGRSS platform and user experience.
- Monitor participation, attendance and engagement.
- Evaluate programme outcomes and social impact.
- Produce anonymised or aggregated reports.
- Deliver programmes funded or supported by corporate partners.
- Meet our legal, regulatory, safeguarding and contractual responsibilities.

6. Who we share your information with

We only share personal information where there is a legitimate and lawful reason to do so.

Service providers

We may share information with trusted organisations that help us operate PRGRSS.

These may include providers of:

- Cloud hosting.
- Database services.
- Video and audio calling.
- Email and notification services.
- Authentication and account security.
- Payment processing.
- App analytics.
- Technical support.
- Customer relationship management.
- Professional advice, including legal, accounting or insurance support.

These providers are only permitted to use personal information for the services they provide to us and must protect it appropriately.

Payment providers

Payment and membership information may be processed by providers such as:

- Apple.
- Google.
- Stripe.
- Other authorised payment platforms.

These organisations process information under their own privacy policies and legal responsibilities.

Authorities and external agencies

We may share information with:

- Emergency services.
- Local authorities.
- Safeguarding agencies.
- Regulators.
- Courts.
- Law enforcement.
- Other organisations where disclosure is required by law.

We may also share information where necessary to prevent harm, protect someone's vital

interests or respond to a safeguarding concern.

Corporate partners

Some users access PRGRSS through a company, employer, charity, funder or programme partner.

Where this applies, we may share limited information with that partner to operate and evaluate the relevant programme.

This may include:

- Confirmation that you are enrolled in the programme.
- Overall participation numbers.
- The total number of mentoring sessions booked or completed.
- Attendance and engagement levels.
- General feedback themes.
- Anonymised or aggregated information about programme outcomes.
- Impact and evaluation data.

Corporate partners will not normally be given access to:

- The private content of your mentoring calls.
- Your private in-app messages.
- Your date of birth.
- Your password or login details.
- Optional diversity information that identifies you.
- Detailed individual usage history.
- Your personal account.

Where a partner provides mentors, the partner may receive information about the activity of its own mentors, such as the number of sessions completed.

Individual information may be shared where:

- You have clearly agreed.
- You have approved a case study, testimonial or success story.
- It is necessary to investigate a safeguarding concern.
- It is required by law.
- There is a serious risk of harm.

Any partner reporting tools will be designed to display only the appropriate information described in this policy.

Optional WhatsApp communities

PRGRSS may offer optional WhatsApp groups or communities.

Joining a WhatsApp group is voluntary.

You should be aware that members of a WhatsApp group may be able to see your:

- Phone number.
- Profile name.
- Profile photograph.
- Messages posted within the group.

WhatsApp is operated by Meta and has its own privacy policy.

WhatsApp groups are separate from one-to-one mentoring. Mentoring conversations must remain within the PRGRSS platform unless PRGRSS has expressly approved another arrangement.

Selling personal information

We do not sell personal information.

PART B — DATA PROTECTION

7. Our legal grounds for using your information

Under the UK General Data Protection Regulation and the Data Protection Act 2018, we must have a lawful basis for processing personal information.

Depending on the circumstances, we may rely on the following lawful bases.

Contract

We process information where it is necessary to provide the service you have requested or entered into.

This may include:

- Creating your account.
- Providing mentoring.
- Managing your membership.

- Processing bookings.
- Confirming payments.
- Delivering programmes.

Legitimate interests

We may process information where it is necessary for our legitimate interests or those of another organisation, provided your rights do not override those interests.

Our legitimate interests may include:

- Keeping users safe.
- Maintaining professional boundaries.
- Improving the service.
- Preventing misuse or fraud.
- Protecting the platform.
- Understanding how programmes are used.
- Evaluating our impact.
- Managing corporate partnerships.
- Running our organisation effectively.

Consent

We may rely on your consent for activities such as:

- Collecting optional diversity information.
- Sending certain marketing communications.
- Using your photograph, story or testimonial.
- Participating in optional research or surveys.

You may withdraw your consent at any time.

Withdrawing consent does not affect the lawfulness of any processing that occurred before consent was withdrawn.

Legal obligation

We may process or disclose information where necessary to comply with the law, a court order, regulatory requirement or other legal duty.

Vital interests

We may process or share information where necessary to protect someone's life or physical

safety.

Special category data

We will normally process optional special category data using your explicit consent.

In limited circumstances, we may process special category data where necessary to:

- Protect someone's vital interests.
- Establish, exercise or defend legal claims.
- Meet another condition permitted by data protection law.

8. Automated decision-making and profiling

PRGRSS does not currently use solely automated decision-making that produces legal or similarly significant effects for users.

Mentor suggestions may be based on the interests, skills, industries and goals you provide.

Account approvals, safeguarding decisions and significant decisions about access to the platform are made or reviewed by people.

We may use automated tools to support administrative tasks, identify technical issues or suggest potential mentor matches. These tools do not make final safeguarding or account-access decisions without human involvement.

9. How long we keep your information

We keep personal information only for as long as it is reasonably necessary.

The length of time will depend on:

- The purpose for which the information was collected.
- Legal and regulatory requirements.
- Safeguarding considerations.
- Contractual requirements.
- Financial and accounting requirements.
- Whether the information is needed to investigate a complaint or legal claim.
- Whether information can be anonymised instead of deleted.

Our general retention periods are set out below.

Account and profile information

We generally retain account and profile information while your account is active.

After an account is closed, the information will normally be deleted or anonymised within 12 months unless there is a lawful reason to retain it for longer.

Messages and mentoring records

Messages and records of mentoring activity will normally be retained while your account is active and deleted or anonymised within 12 months after closure.

We may retain relevant information for longer where it is connected to:

- A safeguarding concern.
- A complaint.
- A dispute.
- Misconduct.
- A legal claim.
- A regulatory requirement.

Payment and financial records

Payment, subscription, invoice and financial records may be retained for up to six years, or longer where legally required.

Safeguarding records

Safeguarding records may be retained for longer periods where necessary to:

- Protect individuals.
- Manage ongoing risk.
- Respond to future concerns.
- Meet legal or regulatory expectations.
- Demonstrate how a concern was handled.

Safeguarding information will only be accessible to authorised individuals.

Anonymised information

Aggregated or anonymised information that cannot identify an individual may be retained indefinitely for research, evaluation, service improvement and impact reporting.

10. How we protect your information

We use appropriate technical and organisational measures to protect personal information.

These measures may include:

- Encryption of information while it is being transferred.
- Encryption at rest where supported by our hosting providers.
- Password-protected systems.
- Account authentication.
- Role-based access controls.
- Restricting staff access to those who genuinely need the information.
- Regular reviews of system access.
- Verification and approval of users.
- Staff safeguarding and data protection training.
- Secure cloud hosting.
- Monitoring for technical errors and security risks.
- Regular review and updating of security measures.
- Contracts and data protection obligations for service providers.

No online platform can guarantee complete security. However, we take reasonable steps to protect information and respond appropriately to suspected breaches.

Where required by law, we will report qualifying personal data breaches to the Information Commissioner's Office and notify affected individuals.

11. International transfers

Some of the organisations that support PRGRSS may store or process personal information outside the United Kingdom.

This may include providers of:

- Cloud hosting.
- Video and audio calling.
- Notifications.
- Email services.
- Analytics.
- Authentication.
- Technical support.

Where personal information is transferred outside the UK, we will use appropriate safeguards where required.

These may include:

- A UK adequacy decision.
- The UK International Data Transfer Agreement.
- The UK Addendum to the European Union Standard Contractual Clauses.
- Contractual and technical protections.
- Another transfer mechanism approved under UK data protection law.

Our aim is to ensure that personal information receives an appropriate level of protection wherever it is processed.

12. Cookies, analytics and tracking technologies

PRGRSS may be accessed through an app, website or other digital platform.

We may use cookies, software development kits and similar technologies to:

- Keep users signed in.
- Maintain account security.
- Remember user preferences.
- Understand how the service is used.
- Monitor performance.
- Identify crashes and technical problems.
- Improve the platform.

These technologies may collect information such as:

- Device type.
- App version.
- Browser information.
- IP address.
- Pages or screens viewed.
- Session duration.
- Technical errors.
- General feature usage.

We do not use this information for third-party behavioural advertising unless we clearly explain this and obtain any required consent.

Where consent is required, we will provide an appropriate notice or consent choice.

13. Your rights

Under UK data protection law, you may have the right to:

- Ask for a copy of the personal information we hold about you.
- Ask us to correct inaccurate or incomplete information.
- Ask us to delete your information.
- Ask us to restrict how we use your information.
- Object to certain uses of your information.
- Ask for your information in a portable format.
- Withdraw consent.
- Object to direct marketing.
- Ask for information about how significant automated decisions are made.
- Complain about how your information has been handled.

These rights are not absolute and may depend on the circumstances.

To exercise your rights, contact:

hello@thisisprgrss.com

We will normally respond within one month.

We may need to confirm your identity before responding to a request.

In some circumstances, we may extend the response period by up to two further months where a request is complex or numerous. Where this applies, we will explain the reason for the extension.

14. Marketing communications

We may send you information about:

- Your PRGRSS account.
- Booked sessions.
- Programme activity.
- Events.
- Membership updates.
- Opportunities.
- Service announcements.
- Relevant PRGRSS news.

Some communications are necessary to operate your account and cannot be treated as optional marketing.

Where marketing consent is required, you can unsubscribe at any time by:

- Using the unsubscribe link in an email.
- Changing your account preferences where available.
- Contacting hello@thisisprgrss.com.

We may still send essential account, safeguarding, booking or service communications after you unsubscribe from marketing.

15. Photographs, testimonials and success stories

We may invite users to participate in:

- Photographs.
- Videos.
- Testimonials.
- Case studies.
- Success stories.
- Promotional campaigns.
- Social media content.

We will seek appropriate permission before using identifiable personal information for these purposes.

You are not required to agree.

Where you have consented, you may withdraw your consent for future use by contacting **hello@thisisprgrss.com**.

Withdrawal may not always allow us to remove materials that have already been printed, published or shared by third parties, but we will take reasonable steps where possible.

16. Safeguarding and information sharing

PRGRSS takes safeguarding seriously.

Where a safeguarding concern is raised, we may access, review, record or share relevant information where necessary to:

- Understand what happened.
- Assess risk.
- Protect a user or another person.
- Investigate inappropriate conduct.

- Contact emergency services.
- Contact a partner organisation.
- Contact a local authority or safeguarding agency.
- Meet our legal or regulatory obligations.

We will share only the information that is reasonably necessary.

We cannot promise complete confidentiality where someone may be at risk of harm.

Safeguarding concerns should be reported to:

hello@thisisprgrss.com

17. Complaints

Where you have a concern about how PRGRSS has used your personal information, contact us first so we can investigate.

Email:

hello@thisisprgrss.com

You also have the right to complain to the Information Commissioner's Office.

The Information Commissioner's Office is the UK regulator responsible for data protection.

Further information is available through the Information Commissioner's Office website.

18. Changes to this policy

We may update this policy from time to time.

Where we make changes, we will:

- Update the version or date shown at the beginning of the policy.
- Publish the revised policy.
- Provide additional notice where a change is significant or legally required.

You should review this policy periodically to remain informed about how we use personal information.

19. Contact us

For privacy, data protection, safeguarding, account or general enquiries, contact:

Global Purpose UK Limited

Company Number: 13667768

Soho Works

180 Strand

London

WC2R 1EA

Data Protection Lead: Shelley Eades

Email: hello@thisisprgrss.com