

## GH Consulting Privacy Statement

### PURPOSE OF THIS PRIVACY STATEMENT

In order to provide our clients with the best services possible, we collect and use personal information. This information allows us to develop an effective relationship and understanding of our clients and tailor our services specifically to client needs. **We are committed to protecting your personal information, to being transparent about the information we hold about you and ensuring GH Consulting Ltd is compliant with current GDPR (2018) legislation.**

The purpose of this policy is to provide a clear explanation about how we collect, process and secure the personal information you give us, and why we need it. This policy should be read alongside other agreements, statements of work and other notices regarding personal data which GH Consulting Ltd may provide. This privacy policy supplements our other policies and is not intended to override them.

The information we collect about you is used in accordance with the EU General Data Protection Regulation (Regulation EU 2016/679), ('GDPR') 2018. Any third parties we involve in the delivery of our services are required to sign an agreement with us detailing their own compliance with GDPR.

### Summary

We use your personal information to enable us to successfully run our business. Our core activities are delivering coaching and mentoring, leadership programmes, team facilitation and well-being consultancy for individual clients and organisations.

We take a fair and common sense approach to collecting, storing and securing the data we use:

- The majority of personal information that we collect, store and secure is given voluntarily by you.
- We will always ask your permission to share any personal information with a third party.
- We will never sell or rent your information to anyone.
- We take security seriously and ensure adequate safeguards are in place to protect your data in the event of theft, loss or misuse.
- We require all associates and third parties involved in the delivery of our services to sign an agreement detailing that their security and data-handing policies are GDPR-compliant
- We will state up-front how we will use the information you share with us. If this changes we will always ask your permission before sharing your information.
- If you have individual privacy needs, we will work with you to ensure your needs are met.
- If any of our systems have a data breach that affects your data we will inform you as soon as we are aware.
- You can request a record of the personal information held on you at any time.

- You can request that any personal information held on you be removed from our systems at any time.

This policy explains:

1. Who we are
2. Information we may collect about you
3. How we collect your data
4. How we may use your information
5. Disclosure of your details to third parties
6. Security of your personal information
7. Data retention
8. Your legal rights
9. Notification of changes to our privacy policy
10. Contact details and further information

If you have any questions, please contact using the contact details at the end of this policy.

## 1. WHO WE ARE

GH Consulting Ltd is a consultancy business owned by Geraldine Haley.

## 2. INFORMATION WE MAY COLLECT ABOUT YOU

Personal information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, i.e. anonymous data.

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Data** includes name, title, and gender. Where relevant we may also collect occupational data, such as your job title, organisation name and professional biography.
- **Contact Data** including your email address - work and personal, phone numbers if you share this information with us. We may also request contact details for your personal assistant, if necessary.
- **Sensitive personal data** – for example, details of the reason for coaching requests, previous development history that you might share with us, and coaching notes written by the coach during sessions. For wellbeing programmes this can include responses to wellbeing surveys which can include details about health and wellbeing, if you share this information with us.
- **Financial Data** for individuals that we make payments to - including bank account and billing address details. These details are likely to be shared with a third-party accountant responsible for payments and invoicing.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data:** our website works through processing unique visitor data and behaviour via temporary and permanent cookies. Visitor data can include internet protocol (IP) address, browser type and version, time zone setting and location, in-site browsing behavior, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website, products and services.
- **Communications Data** includes us making a note of conversations we have had with you in person and/or communications with GH Consulting Ltd. This helps us to manage our relationship with you.
- We may also collect Aggregated Data for use and sharing within your organisation only. Where Aggregated Data may be used we will request your consent through our consent form. Aggregated Data may be derived from your personal information but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

**The following Information is deemed sensitive by us and therefore handled with extra care:**

**Special Category Data:** We do not actively collect Special Category Data. Special Category Data includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, information about criminal convictions and offences. If you choose to share such information, such as in a coaching session, then we will handle it with extra care.

**Business Sensitive Data:** information disclosed by you on the understanding that it is business sensitive will be handled with extra care.

**Data gathered by associates:** Information about you gathered by GH Consulting Ltd associates or employees from their individual interactions with you will be treated in line within the relevant professional code of ethics and will be handled with extra care.

**Psychometric and 360 data:** data about you that has been collected in the process of us providing any psychometric assessment and 360 feedback services will be handled with extra care.

### **3. HOW WE COLLECT YOUR DATA**

We collect information in an open and transparent way. The vast majority of our data is voluntarily submitted by you knowingly.

We collect different information about you in a number of ways:

- Information you give us
- Information relevant people in your organization give us (e.g. as part of a 360 feedback process)
- Information written by us in the course of our engagement with you

- Automated technologies or interactions

A third-party website-builder hosts [www.geraldinehaley.com](http://www.geraldinehaley.com). As you interact with our website, it may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Information we collect automatically online e.g. by use of cookies on our website is not identifiable to individuals. If you browse through the website or download information, our servers will automatically collect numerical counts of visitors by domain, browser type, IP address, keywords used and other standard web measurements. We use the information collected to manage and improve our website and to make it as useful as possible for our visitors.

### **Platforms we use**

We use a variety of platforms to help us collect, store and manage our data, including:

- Google products including Google mail and Google Drive.
- Survey monkey

We may occasionally use other platforms not listed above. Prior to using any external products, platforms or systems we carry out due diligence on third party security and data policy and protections. When using a third party not on the list above we will only notify you if it is relevant and sensible to do so. All our third-party data storage systems are password protected and as a general rule only accessible by employees or associates of GH Consulting Ltd.

### **Why is it being collected?**

We collect information about you in order to deliver the most effective services possible to you and your organisation and to successfully run the organisation and activities we operate on a day-to-day basis. All the information we collect plays a legitimate role in our operations.

## **4. HOW WE MAY USE YOUR INFORMATION**

We will use all your personal information within a GDPR compliant context.

Most commonly, we will use your personal information in the following circumstances:

- In undertaking the contract, we have entered into with you, including setting it up and bringing it to a close.
- To be able to communicate effectively with you and tailor your experience with use to meet your specific needs.
- To run our services as part of and beyond the programme effectively.
- To share information with associates and third parties in order to deliver our contract.
- To support our business operations including our external and internal communications, finance, operations and business strategy.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) identity  (b) contact	Performance of a contract with you
<p>To process and deliver your coaching/ training/ consultancy/research service including:</p> <p>(a) manage payment, fees, charges</p> <p>(b) collect and recover money owed to us</p> <p>(c) write and store client notes</p>	<p>(a) identity</p> <p>(b) contact</p> <p>(c) finance</p> <p>(d) transaction</p> <p>(e) marketing and communications</p> <p>(f) sensitive personal data</p>	<p>(a) performance of a contract with you</p> <p>(b) necessary for our legitimate interests (to recover debts due to us)</p> <p>(c) necessary for our legitimate interests (to conduct research that contributes to the development of knowledge)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) identify</p> <p>(b) contact</p> <p>(c) finance</p> <p>(d) marketing and communications</p>	<p>(a) performance of a contract with you</p> <p>(b) necessary to comply with a legal obligation</p> <p>(c) necessary for our legitimate interests (to keep our records updates and to study how customers use our services.</p>
To administer and protect our business and	(a) identity	(a) Necessary for our legitimate interests (for

<p>this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(b) Contact  (c) Technical</p>	<p>running our business, provision of administration and IT services, network security, to prevent fraud</p>
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### Who will it be shared with?

At the point of collecting any information, we will tell you how the information we are collecting is going to be used. On submitting the information you agree to allow us to use that information as we have stated we will use it. If we want to re-purpose the information we will seek your approval before sharing it.

Any information generated which is deemed sensitive to the individual or organisation will not be shared externally without consent from the individual who has supplied it. Any exchange of information between GH Consulting Ltd employees and associates is based on a 'need to know basis'.

Individual diversity information is kept confidential.

### 5. DISCLOSURE OF YOUR DETAILS TO THIRD PARTIES

We will not disclose information to third parties except where we are legally required to do so, such as if we are compelled to disclose personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

We may share information with associates involved in providing services to you, other service providers or suppliers if the disclosure will enable that party to perform a business, or provide professional or technical support to GH Consulting Ltd.

We require all associates of GH Consulting Ltd to handle and treat information that they encounter with the utmost care and respect, that they are compliant with the 2018 GDPR legislation and that they have security arrangements in place to ensure speedy removal of data related to GH Consulting Ltd activities in the event of computer theft, loss or unpermitted access.

We will never sell or rent information about you or your organisation.

#### Use of personal data for research purposes

We may use personal data collected as part of the services we offer, to also conduct research. This will be in one of two forms:

1. Generic research that will assist us in improving our services e.g. a summary of client feedback;

2. Specific academic and practitioner research in order to contribute to knowledge in the industry.

In both instances you will be informed that the data being collected is for the purposes of research and you can choose whether you want to provide the information or not. Your express permission will be requested for any specific academic or practitioner research that is being conducted where you have been asked to be involved. We will as far as possible, try to ensure that your personal data is unidentifiable unless express consent has been given.

### **Is the intended use likely to cause me to object or complain?**

We do not believe that the way we share or use information on our stakeholders is likely to cause you to object or complain. However, we are reliant on you to tell us if you do not feel comfortable with the information you are being asked to share or to challenge us on how it will be used.

We use utmost discretion when deciding what information will be shared, when and with whom. We never share business sensitive or confidential information with anyone outside of GH Consulting Ltd. Under our current operations, we have had no complaints to date about how we collect, store, handle or share information. We practice extra care when handling sensitive information and work closely with everyone we work with to ensure that individual privacy needs are met on a case-by-case basis.

### **Third Parties**

In the case where third parties used by us mishandle your data we will act swiftly to remediate the situation. We will always contact you to let you know if your data has been mishandled or compromised. In cases where there is gross negligence we will terminate our relationship with that third party.

## **6. SECURITY OF YOUR PERSONAL INFORMATION**

We have put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We require stated agreements from associates and third parties involve in our business processes that they do the same and that they work within a GDPR compliant environment, including having the appropriate security safe-guards in place.

### **Google**

As a precautionary measure, GH Consulting Ltd stores documents related to its business using Google products (google drive, google sheets, google docs etc). Data provided to GH Consulting Ltd is stored within the appropriate Google Account and therefore is governed by their privacy policy. GH Consulting Ltd exercises no control over these third party sites and their privacy practices.

We are a small team with a light technical infrastructure and wherever possible we take care to ensure we are using best practice when it comes to security, putting adequate password protection and safeguards into place.

## Data breaches

If any of our systems have a data breach or there is a data leak of any sort that concerns your data we will inform you as soon as possible by email and take the necessary steps we can to remedy the breach

## Data-handling

We will not transfer, process or store your data anywhere that is outside of the European Economic Area, unless we have a contractual agreement in place that is of an equivalent standard to GDPR.

## 7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 8. YOUR LEGAL RIGHTS

You have a number of additional legal rights relating to your personal data, which are outlined here:

- **The right to make a subject access request.** This enables you to receive certain information about how we use your personal data, as well as to receive a copy of it and to check that we are lawfully processing it.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about you.
- **The right to request that we delete or remove** personal data that we hold about you where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to object to our processing** your personal data where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing
- **The right to request that we restrict our processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** your personal data to you or to another party, in a structured format. This right applies in respect of data that you have provided where our legal ground for using the data is that it is necessary for the

performance of a contract or that you have consented to us using it (this is known as the right to “data portability”).

If you would like to exercise any of the above rights or have any questions or concerns about how your personal data is being used by us, please contact Sian Mitchell in writing by email (see Contact). Note that these rights are not absolute and in some circumstances we may be entitled to refuse a part or all of your request.

Note too that you have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues. Details of how to contact the ICO can be found on their website: <https://ico.org.uk>

The Site may, from time to time, contain links to and from the websites of our other organisations and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

#### **9. CHANGES TO OUR PRIVACY POLICY**

This privacy policy may change from time to time. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### **10. CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be directed to [ea@geraldinehaley.com](mailto:ea@geraldinehaley.com)