

## Caroline Talbott Ltd – Data Privacy Policy

*Updated 21st May 2018*

This policy covers all personal data held by Caroline Talbott Ltd and has been updated to comply with the requirements of the new General Data Protection Regulations (GDPR) which take effect from 25<sup>th</sup> May 2018.

Its purpose is to explain how your personal data is collected, stored, used and protected, and your rights in connection with that.

This policy explains:

1. Information I collect about you
2. How I collect personal information
3. How I use it
4. Disclosure of your details to third parties
5. Security of your personal information
6. Data retention
7. Your legal rights
8. Notification of changes to this privacy policy
9. Contact details

### **1. Information I collect**

‘Personal data’ is information which relates to a living individual who can be identified from that information or other information held by the ‘data controller’.

I collect information only for what the Regulations call ‘legitimate interests’ and ‘contractual necessity’ ie information which is necessary to develop and fulfil the contract between us. I collect and retain the minimum necessary to provide the best possible service to you. This includes details such as your name, contact details, material you provide in connection with our work together (eg questionnaires) and notes of meetings.

You are not required to give consent to my holding this information but you do have the right to object to my doing so. If you think about doing that please consider the impact this may have on my ability to provide you with my services.

I do not collect, hold or use information for marketing purposes or track use of my website.

### **2. How I collect personal information**

From you directly or from the responsible individual in the organisation you work for where my service is provided through them eg your initial contact details.

### 3. How I use this information

- To communicate with you
- To develop and fulfil the contract between us and any third parties
- To comply with any legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

### 4. Disclosure of your details to third parties

I will not disclose your personal information to third parties other than in the following circumstances:

- Where you have agreed to sharing of such information
- Where my services are provided under a contract with your employer and policies you are governed by require such disclosure. My approach is that preferably such information would be disclosed by you
- Where it has been agreed as part of my service to you, relevant personal information may be shared with a partner organisation supporting you eg in attaining qualifications such as ILM and CMI
- Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where I am required to do so:
  - to comply with legal obligations
  - to exercise legal rights (for example in court cases)
  - for the prevention, detection, investigation of crime or prosecution of offenders
  - for the protection of yourself and others

### 5. Security of your personal information

I have put in place appropriate safeguards, both in terms of procedures and the technology I use, to keep your personal information as secure as possible. I only use technology providers and third parties who comply with the GDPR.

My security measures include:

- Regular reviews of the policy and the data held
- Security controls for the data held, both electronic and paper
- Confidentiality contracting

I am registered with the Information Commissioners Office - Registration number:  
**Z2343318.**

## 6. Data retention

I will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however the longest I will hold any of your personal data is 7 years, which is the requirement of my insurance company.

## 7. Your legal rights

You have legal rights to:

- be informed about the personal information I collect and how it will be used
- the right to object
- access your data and to rectify any inaccuracies
- erasure of your data - 'the right to be forgotten' - where there is no compelling reason for its continued processing
- to restrict processing and in particular not to be subject to automated decision-making including profiling
- data portability

You also have the right to complain to the ICO [[www.ico.org.uk](http://www.ico.org.uk)].

The GDPR stipulates that if you request access to your data this will be provided within one month. This request may be refused or charged for if it is manifestly unfounded or excessive.

## 8. Notification of changes to this privacy policy

This privacy policy may be updated from time to time and changes published on my website [carolinetalbott.com](http://carolinetalbott.com).

## 9. Contact details

If you have any questions or concerns about how I collect, store and use your personal information, or wish to exercise any of your rights detailed in section 7 above, please contact me:

- Email: [caroline.talbott@btinternet.com](mailto:caroline.talbott@btinternet.com)
- Tel: 00 44 (0)7850 763281

END