

## Steve Thurlow Consulting Ltd Website Privacy Statement

**The Purpose** of this privacy statement is to explain how Steve Thurlow Consulting Ltd (STC) processes all personal data to fulfil its data protection responsibilities. This statement will be supplemented by any 'specific to client' privacy notices when needed. Brief definitions of data protection, personal data and processing can be found at the end of this statement.

**The scope** of this statement covers all related activities by the staff of Steve Thurlow Consulting Ltd which is referred to as STC for the remainder of this privacy statement.

**The Role of STC**, in data protection terms, is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the STC privacy manager (PM) to ensure that it is processed in accordance with the latest UK data protection legislation.

Occasionally, STC staff will have access to clients' staff personnel data for the purposes of fulfilling contractual obligations. In these circumstances, STC is acting as a data processor and will act in accordance with the clients' instructions.

**The PM can be contacted** by email using [consulting@stevethurlow.co.uk](mailto:consulting@stevethurlow.co.uk) or by writing to the Privacy Manager, Steve Thurlow Consulting Ltd, 24 Pineheath Road, High Kelling, Holt, NR25 6QF.

**The sort of personal data processed by STC** will only be basic contact information for the purposes of networking and business development. Occasionally, contact details are used to prepare contracts and/or setting up invoices but only when these are going to individuals as opposed to a corporate business address.

**STC's duty of confidentiality** means that STC staff will treat client data with due respect and in confidence. It is only disclosed to staff that need to know it. STC uses reasonable organisational and technical measures to ensure personal data is processed securely.

**STC also expects the same duty of confidentiality of all third parties** (see below) with whom it shares personal data. Sharing is kept to a minimum and reviewed regularly.

**STC processes personal data against a lawful basis** and such instances are described below:

- To respond to general enquiries and to retain business contact details for the purposes of networking and promoting the business, we will use our legitimate interests;
- To comply with any legal obligation;
- When it is necessary for the performance of a contract and its prior preparation; and
- When processing a pre-defined purpose for which your consent has been sought and recorded prior to that processing commencing.

**In all cases the processing of personal data by STC shall be:**

- Processed fairly, lawfully and transparently;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary (and no more);
- Accurate and, when necessary, updated;
- Kept for no longer than is necessary; and
- Processed in a manner that ensures appropriate security.

**STC will share personal data** with third parties, but only when absolutely necessary, as follows:

- The Inland Revenue (HMRC);
- Accountants appointed by STC and only for accounting purposes; and
- Unspecified recipients but only when compelled to do so for legal reasons.

**STC will process your data primarily in the UK.** First line personal data processing takes place in the UK, but it is backed-up on site and using the Apple iCloud. Email is processed using a reputable web-based provider and mobile phone contacts are stored on both office IT equipment and mobile phones. The latter are backed up to Apple iCloud. It should be noted that no personal data is stored on the STC's website server.

**STC retains personal data indefinitely** either on the basis of an open contract or on the basis of legitimate interests. In the latter case, if a client or customer wishes their personal data to be removed, and there is no other lawful basis to justify its retention, then it will be deleted or destroyed as appropriate.

It should be noted that when the planning starts to close the business (eventually), individuals will be informed beforehand that their personal data is to be deleted or destroyed. If it is technically impractical to delete electronic copies of personal data, it will be put it beyond operational use.

**The STC websites uses cookies** (and similar technologies) some of which represent personal data. Please read the STC website cookie policy for more details.

**The STC website may link** to other relevant websites. If these are used, the visitor should be aware that the STC has no responsibility for the control, content or handling of personal data by such websites.

**The General Data Protection Regulation defines the rights** that you have (although these do not apply in all situations). For convenience, these rights are shown below:

- **Right to be informed** as to how your personal data is being processed by STC – this is done through this statement or separate STC privacy notices;
- **Right to access** your personal data held by STC which is done by making a 'Data Subject Access Request' (DSAR) to the STC privacy manager;
- **Right to rectification** of your personal data if you believe STC has collected it incorrectly or it needs to be updated;
- **Right to erasure** of your personal data for which STC no longer has a legitimate purpose

to process (this is sometimes referred to as the right to be forgotten);

- **Right to restrict processing** under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved;
- **Right to data portability** of your personal data in a machine-readable version, as you have provided but only applicable to data provided with your consent or under contract;
- **Right to object** to STC processing your personal data for which it does not have a legal or contractual obligation;
- **Rights related to automated decision making and profiling** (however STC does not use these techniques in its decision making);

**Further details on data subjects' rights** can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

**Raising concerns, exercising rights or making queries** about STC's processing of personal data can be done by contacting the STC privacy manager. Please be aware that STC will need to confirm your identity before responding fully. It may be necessary, therefore, to provide proof of your identity (or similar materials) that will enable STC to proceed.

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## **What data protection, personal data and processing means**

The term data protection, put simply, means the controlled use of personal data to protect against misuse and abuse. Personal data is any information relating to an identified or identifiable natural person, also referred to as a 'data subject'. Processing has a very wide interpretation and means any operation which is performed on personal data or on sets of personal data whether or not by automated means. This includes, inter alia, collection, recording, storage, adaptation, retrieval, actual use, dissemination or otherwise making available, restricting, erasure or destruction.