

Heather Paver Ltd

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PRIVACY NOTICE Version 1, May 2018

This Privacy Notice sets out how Heather Paver Limited collects and uses personal information.

This Privacy Notice was last updated on 24th May 2018.

1. Responsibility for Processing Personal Data

Heather Paver Limited is the Data Controller/Processor. This is the legal entity responsible for how personal data is collected, stored and processed. Heather Paver, Director of Heather Paver Limited, is the individual with responsibility for controlling and processing data. The contact details for Heather Paver are given above.

2. Purposes of processing

Personal data is processed as part of coaching and consulting services activities carried out on behalf of customers. Personal data may be contained, for example, in source texts for consultancy and coaching work, reference materials, coaching notes, and reports and outputs, received from or sent to customers via secure electronic means.

Personal data on customers is also held and processed for the purpose of normal invoicing, banking and accounting activities, and as part of normal electronic and other communications with customers.

Personal data on suppliers and service providers (for example accountants, IT consultants, etc.) is also held, for the purpose of obtaining supplies and services to support the business activities of the company.

3. Lawful bases for processing

The lawful bases for processing personal data are as follows:

- Contracts established between Heather Paver Limited and its customers, for the provision of coaching and consultancy, or other services.
- Legal obligations to keep records for tax and accountancy purposes.
- Legitimate interest in processing personal data for commercial purposes.

4. Data retention period

Data retention periods are as follows:

- Data in tax and accountancy records will be retained for the period required by law.
- Data on contracts as well as commercial records and communications will be retained for as long as required to enable the effective operation of the business.
- Personal data contained in source texts for consultancy and coaching work, reference materials, coaching notes, and reports and outputs will be deleted as soon as is practicable, and in any case within six months of the end of the contract. Documents may be retained for as long as required for the operation of the business once personal data has been removed.
- Data not required to be retained for the above purposes will be deleted as soon as is practicable, and in any case within six months.

5. Data sharing

Data will be shared only for the following purposes:

- The supply of coaching and consultancy outputs in accordance with contracts with customers. The data will not be shared with, or disclosed to any third party, except where expressly agreed with or required by the customer.
- The provision of financial and accounts records to accountants for the purpose of producing legally required company accounts.

All data will be handled confidentially, and will not be shared other than for the purposes stated above.

6. Personal Data Rights

All rights accorded to individuals under data protection legislation shall apply in respect of personal data held by Heather Paver Limited.

To find out more about these rights, visit the relevant page on the Information Commissioner's Office (ICO) website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

All individuals about whom personal data is held have a right to lodge a complaint with the Information Commissioner's Office (ICO) about the way their personal data has been handled.