

Setup4Success Privacy Notice (Data Processing)

How we process your personal data

Setup4Success complies with our obligations under the General Data Protection Regulation (GDPR) by keeping personal data up to date; by storing (and destroying it) securely; by collecting only essential data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes

- To deliver the services that clients have requested;
- To contact those clients as necessary in accordance with the services they have requested;
- To contact clients via surveys to ascertain their opinions on the service they received from us;
- To maintain our own accounts and records including certifications, accounts and memberships.

Individual client data will never be passed to a third party without the express consent of the respective client, provided that such confidentiality is not in contravention of any legal action or legal requirement.

In accordance with our need to maintain the possibility of access to client data as a result of returning clients or those who may wish to lodge a complaint in respect of our professional services to either our professional body or our insurers (i.e. in all cases perhaps after a long period of time has elapsed), we retain personal data associated with coaching sessions for a maximum period of 5 years.

Our Lawful Basis for processing client personal data

The client has given clear consent for us to process their personal data for a specific purpose. Further, the processing is necessary for both the client's and my own legitimate interests or for the performance of the contracted agreement and services.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [N.B. This only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data.
- The right to lodge a complaint with the Information Commissioners Office. (See below).

Data Security

We take every precaution to safeguard your personal data, including but not limited to:

- Encryption
- Two-step authentication
- Restricted access
- Limited use and secure disposal of records
- Training and monitoring

Complaints Notice

The client has the right to complain to the Independent Commissioner's Office (ICO) if they think there is a problem with the way we are handling their data (see <https://ico.org.uk/concerns/handling/>).