

# **‘Carole Milligan Coaching & Consulting’ also trading as ‘KingsCompass’ and ‘CALT Associates’ Privacy Policy**

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## **INTRODUCTION**

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This Privacy Policy also sets out your rights to control personal information we hold about you. Please read this Privacy Policy carefully in order to understand our practices regarding your personal data and how we will treat it.

‘Carole Milligan Coaching & Consulting’, ‘KingsCompass’ and ‘CALT Associates’ is a sole trading practice committed to protecting and respecting your privacy. ‘Carole Milligan Coaching & Consulting’, ‘KingsCompass’ and ‘CALT Associates’ (including ‘we’ ‘us’ and ‘our’) will only process personal data you provide to us in accordance with applicable privacy laws. The rules on processing of personal data are set out in the General Data Protection Regulation (‘GDPR’).

Carole Rutherford-Milligan is our data protection officer and can be contacted at [carole@kingscompasscoach.com](mailto:carole@kingscompasscoach.com).

## **DEFINITIONS**

**‘Data controller’** – the person who determines how and why **personal data** will be processed and means ‘Carole Milligan Coaching & Consulting’, ‘KingsCompass’ and ‘CALT Associates’ in this Privacy Policy.

**‘Data processor’** – is responsible for processing personal data on behalf of a data controller.

**‘Data subject’** – a living individual. Anyone who is the subject of personal data.

**‘Personal data’** – any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (see Article 6 of GDPR), for example name, home address, email address and online identifiers include IP addresses.

**‘Processing’** – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organising, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**‘Special categories personal data’** – as set out in the GDPR, the special categories specifically including genetic data, and biometric data where processed to uniquely identify an individual and other examples, include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**‘Third party’** – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

**If you are under 16 years.**

We do not and will not knowingly collect information from any minor under the age of 16. If you are under the age of 16, you may not use our website unless you have the consent of, and are supervised by, a parent or guardian.

### **The purpose of processing your personal data**

We use your personal data for the following purposes:

- Communicating with clients, students, alumni and those interested in our work with updates and news.
- Providing benefits, services and support to clients, students and alumni.
- Administration of courses and programmes.
- Developing our work (through research, partnerships, publications and fundraising).

### **The categories of personal data concerned**

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

**Personal data** including, without limitation your:

- Name
- Email address
- Organisation
- Postal address
- Phone number

### **Coaching clients**

- Notes during the term of the coaching relationship.
- Log of coaching hours.

### **With respect to invoices and payments/receipts:**

- Your/your organisation's purchasing and financial payment details (as required by HMRC).
- Goods and services purchased.

We process **special categories of data** including, without limitation:

- Any special learning needs.
- Dietary requirements.

We will also store, and use named **testimonials** where consent has been given.

The information we hold is obtained directly from information you have supplied by way of forms that you have filled in (such as contact forms, registration forms and invoices) or other written communication.

- We do not sell data.
- We do not share data unless compelled by law.
- We only ask for personal information if it's needed to provide a service.

### **What is our legal basis for processing your personal data?**

#### a) Personal data

We process your personal data in pursuit of our legitimate interest in fulfilling the purposes set out in *'The categories of personal data concerned'* set out above.

Whilst we rely on legitimate interest as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned, we recognise that it is not the only lawful ground for processing data. As such, where appropriate, we will sometimes process your data on an alternative legal basis – for example, because you have given us consent to do so, or to fulfil contractual obligations we may have when you request services from us.

We may also need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies), including for the purposes of investigating a complaint, or if we have your permission to do so.

#### b) Special categories of personal data

To the extent we process your special categories of personal data, in addition to pursuing our legitimate interest in fulfilling the purposes set out in *'The categories of personal data concerned'* set out above, we have obtained your explicit consent, or it may be necessary for reasons of public interest in the area of public health. (*Further information on lawful processing can be found on the ICO website*).

#### Sharing your personal data

Your personal data will be treated as strictly confidential.

Please note, however, that we may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or where we have your permission to do so, for example, for the purposes of psychometric profiling such as DiSC, the Myers Briggs Type Indicator or similar.

#### How long do we keep your personal data?

We keep your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised) and in accordance with our administrative records retention schedule and as required by HMRC. Data will be kept securely and destroyed when no longer required.

#### Providing us with your personal data

We require you to provide us with your personal data in order for us to fulfil the purposes set out in *'The categories of personal data concerned'* described above.

#### 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 the personal data which we hold about you.
- Request that we correct any personal data if it is found to be inaccurate or out of date.
- Request your personal data is erased where it is no longer necessary to retain such data.
- Withdraw your consent to the processing of your special categories of personal data at any time, where consent was the lawful basis for processing such data.

- Request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means).
- Request a restriction is placed on further processing, where there is a dispute in relation to the accuracy or processing of your personal data.
- Object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests or the performance of a task in the public interest/exercise of official authority), direct marketing and processing for the purposes of scientific/historical research and statistics).

### **Website**

Hosted by Provider: Monkey Tree Hosting (MTH)

Our website hosting company processes data processed through the KingsCompass website, accessing this only on our instruction.

Maintained by: Audacious Creative

Our website development provider has access to the CMS part of the site, for support and maintenance purposes only. It does not process any of your data form the website.

### **Website e-commerce (course purchase)**

Third-party providers: PayPal.

We use PayPal to process course payments through the website. These third-party providers are data processors for us and only process personal information in accordance with our instructions.

### **'Zoom' video conferencing and learning platform**

Live learning sessions are enabled by our provider 'Zoom'.

Recorded sessions are encrypted and stored on the Zoom 'cloud', are made available only to participating programme clients, and are password protected.

### **Cookies**

Cookies are not used on our websites.

### **Social Media**

Third-party providers, including: Linked In, Facebook, Twitter, You Tube, Vimeo.

If you send us a private or direct message via social media, the message will be stored by a third-party provider.

### **Email**

We monitor any emails sent to us for viruses or malicious software, including file attachments. Please be aware that you have a responsibility to ensure that any email you send is within the confines of the law.

### **Security and Performance**

We use a third-party service to assist in maintaining the security and performance of our website, which requires the processing of website user's IP addresses to do so. Whilst we take appropriate technical and organisational measures to safeguard the personal information that you provide to us, no transmission over the Internet can ever be guaranteed secure. Consequently, please note that we cannot guarantee the security of any personal information that you transfer over the Internet to us.

### **Automated Decision Making**

We do not use any form of automated decision making.

### **Further Processing**

If we wish to use your personal data for a new purpose not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

### **Changes to our Privacy Policy**

Please check back regularly to keep informed of updates to this Privacy Policy as you will be deemed to have accepted any changes if you continue to use our website after an update has been posted.

### **How to Make a Complaint**

We endeavour to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously and encourage individuals to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate, and welcome any suggestions for improving our procedures. To exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer Carole Rutherford-Milligan at: [carole@kingscompasscoach.com](mailto:carole@kingscompasscoach.com)

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on (local rate) or 01625 545 745 if you prefer to use a national rate number or via [email](#) or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

**This policy was last updated 16th September 2018**