

KLI

LEADERSHIP CONSULTING & COACHING

Website privacy notice

1. INTRODUCTION

This privacy notice provides you explains how we collect and process your personal data through your use of our site www.KLIConsult.com

By providing us with your data, you warrant to us that you are over 13 years of age.

KATE LYE of KLI CONSULTING LTD is the data controller and is responsible for your personal data.

I have appointed a Data Protection Officer who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Officer using the details set out below.

Contact Details

Our full details are:

Full name of legal entity: **Kate Lye**

Name or title of Data Protection Officer **Emily Knight**

Email address: Katelye@kliconsult.com

Postal address: 5-9 Eden Street, Kingston-upon-Thames, Surrey, KT1 1BQ

Telephone number: **N/A**

It is very important that the information we hold about you is accurate and up to date. Please let us know if your personal information changes, at any time by emailing us at emily@kliconsult.com

2. **WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

- **Communication Data** - this includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interest which in this case is to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

- **Technical Data** - this includes data about your use of our website and online services such as your IP address, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our Google analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website and deliver relevant website content. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to determine our marketing strategy.
- **Communication in relation to contracted work:** We will use your email/postal address to send books/work materials to you and general information in relation to the contracted work/project. Our lawful ground for this processing is contractual consent, contract and legitimate interest.
- **Psychometric data:** We retain Psychometric data such as a Hogan Assessments or other 360 Feedback assessment reports for a minimum of 7 years. Our lawful ground for this processing is Consent and Contract.

Sensitive Data

We do not collect any sensitive data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at katelye@kliconsult.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

3. MARKETING COMMUNICATIONS

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you asked for information from us about our services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

6. DATA SECURITY

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We use 'Box' which provides a Cloud Content Management platform with features to help us meet global data protection and compliance obligations. Box meets and supports some of the highest benchmarks for security and privacy including ISO 27001, ISO 27018, and the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the BSI C5 attestation. For organizations with European data protection obligations, Box has Processor Binding Corporate Rules and Controller Binding Corporate Rules (BCRs) and participates in the E.U.-U.S. and Swiss-U.S. Privacy Shield Frameworks to provide a legally recognized way to transfer data across European borders. In the Asia-Pacific region, Box is certified under the Asia-Pacific Economic Cooperation (APEC) Cross-Border Privacy Rules (CBPR) System. Additionally, Box has achieved two German certifications — the Cloud Computer Compliance Control Catalogue (C5) and Trusted Cloud Data Protection Profile (TCDP) — which illustrates our commitment to data protection and security. Through the BSI (German Federal Office for Information Security) C5 attestation, Box demonstrates that we meet the security standard the BSI has defined for cloud service providers. With the TCDP, Box has been independently audited for compliance with the German Federal Data Protection Act (BDSG).

We use Office 365 for our email system and have setup Multi-Factor Authentication to provide extra security.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

7. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

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

If you wish to exercise any of the rights set out above, please email us at emily@kliconsult.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

9. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

10. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy here: <http://www.kliconsult.com/cookie-policy.html>