

## Privacy / Data Protection policy

### Organisation details

Shelley Whitehead trading as Lock House Consulting ("we", "us", "our")  
Business address: Lock House, Wootton Rivers, Wiltshire, SN8 4NQ.

We are committed to respecting your privacy and recognise your need for appropriate protection and management of any personally identifiable information ("personal data") you share with us.

We have established this Policy so that you can understand the care with which we intend to treat your personal data.

We strive to comply with all applicable laws that are designed to protect your privacy, based on this Policy as a standard.

This Policy describes how we collect and process personal data by persons who provide us with their personal data, whether through our website (<http://www.lockhouseconsulting.co.uk/>) or otherwise interacting with us, as set out below.

### How to contact us

If you have any questions regarding your personal data and how we may use it, including any queries relating to this Policy, please contact us at [enquiries@lockhouseconsulting.co.uk](mailto:enquiries@lockhouseconsulting.co.uk) or writing to The Director at the address noted above.

### Terminology used

From 25 May 2018, our data processing activities will be governed by the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPRs"). For the purpose of the GDPRs, we are the 'Data Controller' of all personal data obtained by us as set out in this Policy, because we ultimately determine how your personal data will be handled by us or our sub-contractors, who may be our 'Data Processors'.

If we handle your personal data then you are a "Data Subject". This means you have certain rights under the GDPRs in relation to how your personal data is processed, which are set out in this Policy.

'Personal data' is any information that can be used to identify you, including your name, e-mail address, IP address, or any other data that could reveal your physical, physiological, generic, mental, economic, cultural or social identity.

'Special category data' means information about you that is sensitive and includes 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.

### Personal data that we collect in relation to you

Personal data that we collect in relation to you:

1. Your name.
2. Your e-mail address and contact information.
3. Location data (only collected where you include this on a document that you explicitly give us).
4. Your career details and/or a summary of this as a BIO in which you may have included special category data (only collected where you provide/include this on a document that you explicitly give us).

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## How we collect your personal data

If you contact us (by telephone, e-mail, social media or messenger service, through our website contact form, physical post or voice) we will collect your personal data and process it in accordance with the processes outlined in this Policy, including our Privacy Principles and the basis for processing your personal data. This may include discussing matters with you in relation to an enquiry about our services or a contract that we may enter into with you, or a service that we may be providing to you, a client or your employer.

If we speak with you via an online meeting (whether audio or video) using a third party conference call service, such conversations may be recorded and held by the third party conference call service. We will not store this information directly.

We will not collect personal data from you based on your use of our website (<http://www.lockhouseconsulting.co.uk/>) other than where you submit an email enquiry to us through the website.

## How we use your information

This Policy tells you what to expect when we collect your personal data.

We will only process your personal data if we have a legal basis for doing so, as outlined in this Policy or as notified to you at the time we collect your personal data, and for the purposes for which it was collected for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you prior to commencing that processing and we will explain the legal basis which allows us to do this. Please note that we may process your personal data without your knowledge or consent, where this is required by law.

Your personal data may be shared in accordance with our principles on transfers to third parties as set out later in this Policy, including (but not limited to) the following:

- any member of the same client and/or project team with whom you are directly associated or with whom you are applying to for a paid employment or voluntary role;
- third parties where we are under a duty to disclose your personal data to comply with any legal obligation, or to appropriate regulators or other law enforcement organisations;
- third party suppliers to us, including (for example) insurance providers, accountants, auditors;
- the UK Department for Education, and/or its regional teams.

If your personal data is to be shared with any other third parties, we will take steps to protect your personal data.

Where you provide us with special category data, we will only use such data if we have obtained your consent for such processing.

## On what basis we process your personal data.

We are not allowed to process your personal data unless we have a legal basis for doing so.

There are four main legal bases that we rely on when it comes to processing someone's personal data. These are:

(1) "Legitimate interest" - this is where we need to process your personal data, for example, if we need to contact you because you have raised a general query with us or where we are in contact with you about this or similar issues. We may also have a legitimate interest to contact you about services that may be of interest to you, in accordance with this Policy.

(2) "Necessary for performing a contract" - this is where if we are in a contract with you or a directly connected client project (or about to enter into a contract with you or a directly connected client project and you have requested certain pre-contract details) and we need to use your personal details to complete this contract - for example, we might need to use your e-mail address to communicate with you, which would count as processing your personal data, or we may need to collect your BIO (biographical summary) or CV (curriculum vitae) to evidence skills and experience. (a 'directly connected client project' means where your organisation is part of and named in a client project where another organisation in that client project holds the contract for services with us).

(3) "Consent" - this is where we set out specific circumstances where we want to process your personal data and request your consent for this. We will make sure that your consent is explicit. We will usually ask you to give your consent in an email or tick a box (or similar) to confirm that you have provided your consent. For example, (a) where we need to share contact information between parties working on a client contract that you are directly connected to, or (b) you have applied to us for a role with an organisation for whom we are recruiting voluntary or paid roles and shared your CV and BIO with us; we will require your consent to share your data with the recruiting organisation and the Department for Education.

(4) "Compliance with a legal obligation" - this is where we might need to process your personal data in order to comply with a common law or statutory obligation, such as disclosures for compliance with HMRC requirements, requirements relating to money laundering or other such disclosures. We will only process your personal data for this reason if it is necessary and we would not otherwise be able to comply with that legal obligation without such processing.

## **Our Privacy Principles**

### **1. Notice about what we do with your data**

We will only process your personal data in accordance with notices set out in this Policy, or as provided to you at the time we collect your personal data (if necessary for the intended processing).

Your personal data will only be held within an email or contacts or word processing system such as Microsoft office/365, stored on physical IT equipment that we own or that is hosted to us by our IT support partner (PriorityIT), including PCs. We will not hold or process your data in mass marketing tools or products.

### **2. Choice on providing us your personal data**

If you choose not to provide the personal data we request you may be unable to access certain services that involve our interaction with you.

If you chose to have a relationship with us, such as a contractual or other business relationship or partnership, we will naturally continue to contact you in connection with that business relationship, in accordance with this Policy and any additional contractual terms agreed with you.

### **3. Access and accuracy of your data**

To the extent that you do provide us with personal data, we wish to maintain accurate personal data. Where we collect personal data from you, we want to provide a means for you to contact us should you need to update or correct that information. You may send updates and corrections about your personal data to [enquiries@lockhouseconsulting.co.uk](mailto:enquiries@lockhouseconsulting.co.uk) and we will incorporate the changes to your personal data that we hold and try to do so as soon as practicable.

### **4. Third party and Client services/processing**

Third parties provide certain services on our behalf.

We provide services to clients under an agreed contract.

We may provide personal data that we have collected to third party service providers or to clients to help us deliver programmes, products, information, and services.

Where we provide your personal data to third parties who are acting on our behalf (known as "Data Processors") we will rely on that third party to have in place sufficient safeguards and processes in place to protect your personal data.

The only third parties that we may send your personal data to are either:-

- the Department for Education or its regional teams (only on specific request in association with a voluntary paid role, and only with your consent);
- a bank for whom we need to use to pay you for services provided to us;

Where we provide your personal data to clients for whom we are contracted, we are acting as both “Data Controller” and “Data Processors”. We will rely on that client to have in place sufficient safeguards and processes in place to protect your personal data.

The only clients that we may send your personal data to are either:-

- the client for whom the data is required and for whom you either work for, you are directly associated with or you have applied to a role with.

## 5. International transfers

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

## 6. How we decide for how long to retain your personal data

We cannot definitively set out how long we will retain all personal data in this Policy - this is a general notice that deals with different personal data collected for a variety of reasons. However, we decide how long we will retain your personal data based on the following factors:

- If we are performing a contract for you, or you have applied to a voluntary or paid role with a client with whom which we are contracted - for the length of that contract and for approximately 6 years afterward to deal with any post-contract issues and as evidence of the performance of the contract.
- If you are in contact with us - we will retain your personal data as long as it is necessary for us to conclude the relevant correspondence with you, and may retain that data for a further period of 6 years afterwards as evidence of that correspondence.
- Whether we think there is a likelihood of you contacting us again in the near future or if we think we need to contact you again, provided that the legal basis (see above) for doing so still exists, for no longer than is necessary in respect of that legal basis.

## 7. Automated decision making

We do not use automated decision making.

## 8. Your rights as a Data Subject

You have the following rights in relation to your personal data:

- The right to be informed - this is information on for what purpose we are processing it and what personal data we are processing.
- The right of access - you have the right to be provided with copies of the personal data of you that we are processing as well as confirmation of the processing we are doing. You can do this by sending a "subject access request" to the contact details noted above for our consideration.
- The right to rectification - if you think the personal data that we hold on you is inaccurate or incomplete you can tell us and we will fix it.
- The right to erasure (also known as the right to be forgotten) - if you want us to permanently delete the personal data we hold for you then you can ask us to do so.
- The right to restrict processing - if you do not like how we are using your personal data then you can let us know and we will stop processing it in that way.
- The right to data portability - if you want us to pass on your personal data to someone else then please let us know. This transfer should not affect the integrity or otherwise damage your personal data.
- The right to withdraw your consent - you can withdraw your consent for us to process your personal data at any time by contacting us. If we have relied only on your consent as the basis to process your personal data then we will stop processing your personal data at the point you withdraw your consent. Please note that if we can also rely on other bases to process your personal data aside from consent then we may do so even if you have withdrawn your consent for different purposes under that different legal basis.
- Where you have provided us with your CV or BIO and have consented to it being shared in line with this policy, you may withdraw your consent to us sharing your information and we will no longer share your personal data, from the point you withdraw your consent. However, in such cases we will retain your details for the purposes of evidencing the services provided to our clients.

To exercise any of your rights, please contact us at [enquiries@lockhouseconsulting.co.uk](mailto:enquiries@lockhouseconsulting.co.uk). In addition to the above, as a data subject you can file a complaint with your local data protection authority within the EEA if you are not happy with how we are processing your personal data. Please note that you can use whichever local data protection authority within the EEA that is most convenient for you.

Where you initiate your right to request access to the personal data we process about you, you will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate access 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 and keep you updated.

## 9. Children's privacy

We do not intend to collect personal data from anyone we know to be under 16 years of age.

Although our services are not targeted at children, there may be some incidental collection of personal data relating to children that takes place as part of our service offering. If we know or suspect we are going to handle personal data in relation to children and are relying on consent to do so, then we will obtain consent from a parent or guardian of the relevant child before handling that child's personal data.

## Visitors to our websites

When someone visits <http://www.lockhouseconsulting.co.uk/> our main corporate website we may collect standard internet log information and details of visitor behaviour patterns. Where collected this is used to find out things such as the number of visitors to the various parts of the website. This information would be collected by the website host provider in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. We will not associate any data gathered from this website with any personally identifying information from any source.

By using this website you agree to our collection and processing of personal data on the website for the purposes given above. Should this Policy change we will try, by taking every reasonable step, to bring this to your attention.

Our website contains links to external websites. Please note that we are not responsible for the privacy practices of any websites other than our own.

**Remember the Risks Whenever You Use the Internet:** While we do our best to protect your personal data, we cannot guarantee the security of any information that you transmit to us and you are solely responsible for maintaining the secrecy.

## Use of cookies by us

The website hosting provider that we use may place cookies on your computer to help make your use of our website better. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

We do not access any information that the website hosting provider may collect, and we do not collect personal data via our website unless you directly contact us through the contact page <http://www.lockhouseconsulting.co.uk/contact/>.

## Changes to this Policy

As and when necessary, changes to this Policy will be posted on our website. Where changes are significant, we may also email you and where required by law, we will obtain your consent to these changes.

Lock House Consulting- ICO Registration Number:- ZA681103

Date of Policy review - 25 March 2024

Next Review Date - April 2025