



GDPR data Privacy notice for Lynn Pilkington Jul 21

This is privacy notice of Lynn Pilkington consulting.

I respect your privacy and I'm determined to protect your personal data. The purpose of this privacy notice is to inform you as to how I look after your personal data.

I'm sorry that this is so long and boring, and possibly confusing. I aim to update this to be clearer and more digestible as soon as I have time 😊

As a personal framing note, I have set up this website and associated activities as a sole trader. I have consulted three experts on cyber security and GDPR, read widely on the topics and I use this to make well-informed judgements in any activity I conduct. I have assessed the risk of any data breaches to be low and the impact, if this did happen, to be small on the rights of individuals.

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how I collect and process your personal data.

Data controller

Lynn Pilkington is the controller and responsible for your personal data. Our contact details are Lynn@lynnpilkington.com. This means we decide how your personal data is processed and for what purposes.

Lynn Pilkington Consulting is committed to protecting and respecting your privacy.

This notice, my website terms of reference and cookies policy sets out the basis on which any personal data I collect from you, or that you provide to me, will be processed by me. Please read the following carefully to understand the views and practices regarding your personal data and how I will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation.

Third-party links outside of our control

Note that my 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. I do not control these third-party websites and am not responsible for their privacy statements.

Personal Data We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).



I may collect, use, store and transfer different kinds of personal data about you, including:

- **Identity Data** – such as your name, or profession.
- **Contact Data** – such as your email address or telephone numbers.
- **Technical Data** – such as your location, your login data, browser type.
- **Usage Data** – such as information about how you use our website.
- **Marketing and communications data** – such as your preferences in receiving marketing from me.

If you fail to provide personal data

Where I need to collect your personal data by law, or under the terms of a contract I have with you and you fail to provide that data when requested, I may not be able to perform the contract we have or are trying to enter into with you. In this case, I may have to cancel a product or service you have with me but I will notify you if this is the case at the time.



How I collect your personal data and how I use your personal data

Please see the table below which outlines the different methods used to collect data, how this data is used and the legal basis for doing so:



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Processing Activity/How I collect data	Purpose of the Processing	Description of the categories of data subjects	Lawful basis for processing including basis of legitimate interest	Description of the categories of personal data	Categories of recipients	Envisaged time limits for different categories of data	Method of disposal	General description of the technical/ organisational security measures
Email correspondence with clients, potential clients and other enquiries	To manage our relationship with clients, partners, potential clients and respond to other enquiries. This may include notifying you about changes to our terms or privacy policy	Customers, partners, supporters	Performance of a contract; Necessary for our legitimate interests (for running the business); Necessary to comply with a legal obligation	Identity and contact information	Only Lynn Pilkington *with the exception of third party support outlined below.	2 years	Archive email every 2 years.	Two factor authentication on email, back-ups, all security updates performed, password manager used, only one person has access to laptop and other devices.
'Contact me' form on website	As above	As above	As above	As above	As above	As above	As above	As above
Direct messages on social media or information shared	As above	As above	As above	As above	As above	To be kept until social media	Social media accounts deleted	As above



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through twitter, Instagram or LinkedIn						accounts deleted.	when Lynn Pilkington consulting ceases to operate.	
Cookies information from website	To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Anyone visiting the website	Necessary for our legitimate interests (to study how customers use our website, to grow our business and to inform our marketing strategy)	Usage data, Marketing and Communications data, Technical data	As above.	To be kept until website ceases to be used.	Squarespace account deleted and with it all information removed.	Two factor authentication, domain locked, domain enhanced security measured subscribed to, password manager.
Record of any adaptations required for people engaging with business/website/comms	to make services/communications more inclusive or accessible for individual needs	Clients or supporters	Necessary for the performance of a contract with you (agreed delivery of service of engagement in activity); If special	Personal information. Special categories of data – access needs which can include medical conditions.	As above.	Information keep in email – therefore as above with email. If information communicated verbally, no written record will be kept of data.	As emails above.	As emails above.



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			category explicit consent of the data subject will be obtained					
Signing up for newsletter and sending newsletter campaigns	to interact with audience, clients and other interested parties and grow the business. To manage our relationship with you. This may include notifying you about changes to our terms or privacy policy	Anyone that signs up for newsletter.	Necessary for our legitimate interests (to interact with audience, clients and other interested parties and grow the business); Necessary to comply with a legal obligation	Usage data, Marketing and Communications, Technical, identity and contact data.	As above	2 years (people can unsubscribe at any time included in every email)	Ensure all parties want to stay on mailing list every 2 years and delete records from Mailchimp.	Using secure platform (Mailchimp) with two factor authentication; and all other security as above. Only one person has access to passwords.

Note: for the special categories of data which may involve declaring a medical condition, explicit consent to process the data will be obtained.



Notes on how I use your personal data:

I will only use your personal data when the law allows me to. Most commonly, I will use your personal data in the following circumstances:

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of the business in conducting and managing the business to enable us to give you the best service/product and the most secure experience. I make sure we consider and balance any potential impact on you and your rights before I process your personal data for my legitimate interests. I do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that I am subject to.

Note on who we share your personal data with:

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

- External Third Parties Service, such as:
 - Professional advisers acting as processors, including lawyers, bankers, accountants, auditors and insurers based in the UK who provide consulting, banking, legal, insurance and accounting services.
 - HM Revenue & Customs, regulators and other authorities acting as processors based in the UK.
- Service Providers and others who help with our business operations and assist in the delivery of our products and services including, but not limited to site hosting, maintenance, data analysis, IT services, customer service, email delivery services, marketing and analytics.
- Persons or entities with whom you consent to have your Personal Data shared;
- Third parties in order to prevent damage to our property (tangible and intangible), for safety reasons, or to collect amounts owed to us; and
- Third parties as we believe necessary or appropriate, in any manner permitted under applicable law, including laws outside your country of residence to: comply with legal process; respond to requests from public and government authorities, including public and government authorities outside your country of residence; enforce our Terms of Service Agreement and other agreements; protect our operations; protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and allow us to pursue available remedies or limit the damages that we may sustain.



We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We will never sell, rent, or lease your Personal Data to a third party.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing. You can ask us to stop sending you marketing messages at any time by emailing: lynn@lynnpilkington.com.

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 our website may become inaccessible or not function properly. For more information about the cookies we use, please see the cookie policy.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact lynn@lynnpilkington.com. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Security measures include:



- Regular advice and information on IT security consumed and implemented;
- Two factor authentication used on business sensitive platforms;
- Regular virtual and physical back-ups of information;
- Anti-virus software installed and all security updates performed,
- Password manager used;
- Only one person has access to laptop and other devices.
- Website domain locked;
- Domain enhanced security measures in place.

We will respond appropriately and sensitively to any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Unless subject to an exemption under the data protection laws, 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;
- 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 to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller;
- 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 our processing of personal data, where applicable

If you wish to exercise any of the rights set out above, please lynn@lynnpilkington.com.

No fee required – with some exceptions

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 admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

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 and keep you updated.

Changes to this notice and the duty to inform us of changes

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

Queries, questions or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact lynn@lynnpilkington.com.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.

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