



## Privacy Policy

### ABOUT THIS POLICY

At Rachel Woodward Ltd we are committed to protecting your personal data. This privacy policy explains how we handle the personal data which we hold including the personal data which we collect when you use this website at [www.rachelwoodward.co.uk](http://www.rachelwoodward.co.uk). It also explains your privacy rights and how the law protects you including how we comply with the General Data Protection Regulation (“GDPR”) and other related legislation which relates to the use of personal data.

Additional information may be provided on particular pages of this website for example, on any specific pages where we collect personal data and you should also refer to those.

### PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how Rachel Woodward Ltd collects and processes your personal data for example when you use this website, purchase services from us or get in touch for any reason, including by phone or email.

It is important that you read this privacy policy together with any other statements or fair processing notices we may provide on specific occasions when we collect or process personal data so that you are fully aware of how and why we are using your data. This privacy policy supplements those other notices and is not intended to override them.

### HOW TO CONTACT US

For the purposes of this website and the information collected through it Rachel Woodward Ltd is a data controller and is responsible for your personal data. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us, using the following details:

**Rachel Woodward**

**Address:** Highgate House, 134 Highgate, Kendal, LA9 4HL

**Email:** [rachel@morethenmediation.co.uk](mailto:rachel@morethenmediation.co.uk)

**Tel:** 07872 452435

You have the right to make a complaint to the Information Commissioner’s Office (ICO) which is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, like the opportunity to assist you with any concerns before you approach the ICO so please contact us in the first instance using the details above.

### YOUR DUTY TO INFORM US OF CHANGES

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

If you provide us with information about any other person, for example any other individuals within your organisation or your business partners, then you must ensure that you have their consent to pass those details to us and for us to use those details in accordance with this privacy policy. You should also make sure that you bring this policy to their attention.

### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. For example, we provide links to our social media pages. 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 policies. You should read any policies and other statements on such websites carefully.

### THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data which has been anonymised such that a person's identity is removed.

We may collect, use, store and transfer different kinds of personal data. The majority of personal data which we use is provided to us and used by us in the context of our business operations and the business operations of our customers, suppliers and other contacts. However, we may use personal data belonging to participants, for example if you are a participant on a personality type indicator course. The categories of person data which we use include:

- **Identity and Contact Data** such as names, titles and other identifiers together with personal or business address, email address and telephone numbers.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. This may also include information about how you use our website and our services.
- **Marketing and Communications Data** includes preferences in receiving marketing from us.

### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, under the terms of a contract we have with the organisation you represent or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require or otherwise properly deal with your request.

### HOW IS YOUR PERSONAL DATA COLLECTED?

Most of the personal data which we hold is collected directly through the website, for example if you provide certain identity information when you complete the enquiry form on our "Connect" page. We may also collect your personal data over the phone or via email.

Some of the technical data which we collect may be collected automatically as you interact with our website, for example via the use of cookies and similar technologies.

### PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. The information below explain the purposes for which we use different categories of personal data and the legal basis or bases which we believe applies to those uses. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### ***Providing services***

We may process your identity and contact data where you, or the business you represent is a client of Rachel Woodward Ltd, to contact you and to liaise with you in order to provide our services to you. We may also process your data to deal with ancillary matters such as sending invoices. We process your personal data in this way (where we contract with you as an individual) on the basis that it is necessary for the performance of the relevant contract that you have entered into with us, or it is necessary to take steps you have asked us to take prior to entering into a contract. Where we otherwise contract with the business entity you represent, we process your personal data as it is necessary for our legitimate interests in providing our services.

### ***Administration of our website***

We may process your identity and contact data and technical data, for the purposes of administering and operating this website. This may include troubleshooting, data analysis, testing, system maintenance and support. This helps us to continually improve this website and the services we can offer. We process your data in this way on the basis that this is necessary for our legitimate interests in managing, administering and improving this website and our services. This may also be necessary to comply with legal obligations.

### ***Responding to enquiries***

If you contact us with a message or enquiry (for example through our “Connect” page) or if you want to speak to us, we will use your identity and contact data in order to respond to you. Processing your data in this way is necessary for our legitimate interests in the operation of our business, in order to provide our client service to you.

### ***Providing information about our services***

We may from time to time contact you with marketing communications such as to tell you about other services we offer which we think may interest you. To do this we will use your identity and contact data, and may also use your technical, and marketing and communications data. We process your data in this way as it is necessary for our legitimate interests to develop, market and promote our services. Further information about our marketing activities can be found below.

## **MARKETING AND PROMOTIONS**

From time to time we may use your data including identity and contact data, technical data and marketing and communications data, to contact you with information about our services. You will receive marketing communications from us if you have agreed to be included on our marketing database or in some cases where the organisation which you represent has purchased services from us.

## **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 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 also 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.

If you would like further information about how we use personal data and the purpose which we might use it for, please contact us.

## DATA SECURITY

We take reasonable technical and organisational precautions and security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, contractors and other third parties who have a business need to know it. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## TRANSFERS OF DATA OUTSIDE THE EU

Your personal data is not generally transferred outside of the EU, however as part of our use of online providers, such as Dropbox for document storage, your personal data may be electronically transferred and stored by online providers who operate from countries outside of the EU, including the US. Whenever we transfer your personal data out of the EU, we ensure that a similar degree of protection is afforded to it by ensuring that at least one of the safeguards permitted by law is in place. For example, in relation to transfers to the US, the U.S. Department of Commerce operates the Privacy Shield which is deemed by the European Commission to be an adequate mechanism to enable data transfers. Dropbox is self-certified under the Privacy Shield program, and therefore as a participant it is required to provide certain standards of protection to personal data shared between Europe and the US.

## 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, we may anonymise 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 policy to you.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Those rights are listed below. Please contact us if you would like to exercise any of them. You have the right to:

- **Request access** to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to

object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.

- **Object to processing** of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. You can also object to direct marketing. In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- **Request restriction of processing.** You can ask us to suspend the processing of your personal data: if you want us to establish the data's accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- **Withdraw consent at any time** where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

### EXERCISING YOUR RIGHTS

You will not have to pay a fee to access your personal data (or to exercise any 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 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 personal data is not disclosed to a person who has no right to receive it. We may also contact you to ask you to clarify 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 which case we will keep you updated.