



# Privacy Notice

This **Privacy Notice** sets out the steps we follow when personal data is collected, **such as our identity and how we intend to use the information, the lawful basis for processing the data, our data retention periods and that individuals have a right to complain to the ICO** if they think there is a problem with the way we are handling their data.

## Who we are

J P Feltham Associates Ltd PO Box 270, Gosport, PO12 9FH

Registered in England No 10041415

Registered Office: 12a Fleet Business Park, Sandy Lane, Church Crookham, Fleet, Hampshire, GU52 8BF

## What information we collect and hold that constitutes personal data

The majority of the information we collect and hold that can be classed as 'personal data' is name, address and other contact details such as email address and telephone number of our existing customers, suppliers and other stakeholders, to enable us to provide our consultancy services. Additionally, we will hold the information required for collection and payment of invoices.

We also collect and hold information on staff necessary to manage and support our employees.

Prospective customers contact us by direct referrals from their own research or business networks, we do not market our activities to prospects. We will maintain prospective business contact information only to answer their initial enquiries regarding our services.

## How is it collected and by whom?

Personal data is collected when we are asked to answer enquiries on our consultancy service, enter into a contract to provide consultancy support or engage the services of a supplier. This will be done by a member of our team, for example, Administrator or Director.

We collect employee data as part of our HR processes.

Whilst providing our 'audit' service to customers we may witness examples of their management of personal data for example competency records but to ensure this is protected we anonymise audit reports and do not remove copies of such data from our customer's premises.

We may use Google Analytics and Cookies on our web site to record quantitative data such as visitor numbers, pages viewed etc. but we do not track individuals online e.g., using Lead Forensics, or use inferred information through algorithms, or profile people by analysing data derived from combining other data sets.

## What we do with the personal data we process?

We are only collecting information we need and are going to use. We use the 'personal data' generally for carrying out our business as an ISO management consultancy, for example, to answer enquiries, manage projects, and communicate customer relationship information.

We do not use your information for a particular purpose other than to carry out our business and communicate with you where appropriate, nor do we collect personal data by observation or draw inference from any individual's behaviour. We will not share any data with third-parties for marketing purposes.

We may, however, use the data provided by an existing customer to send them information on a related product or service that we think may be beneficial to their business. This would only be done in a reasonable way, and in a manner that a business contact would expect.



### **How long we keep personal data?**

We have specific retention times for each category of data which are set out in our management system.

### **Who will your data be shared with?**

Data will only be shared with external third parties when there is a specific business need, for example we might share data would be if we were to outsource an aspect of work, or employee data will be shared with the pension provider.

To cover this sharing of data, we have contracts in place with all the suppliers that may come into contact with any of the data we hold, to ensure the supplier is compliant with GDPR, and recognise their responsibilities when processing our data.

All reasonable steps are being taken to ensure data security both organisationally and technologically. As part of our data security measures, staff can only access our computer systems through password protected system with access levels as relevant to their job responsibilities. We utilise brand-named back up solutions, which in turn means we are 'sharing' data with back up providers. They use strict security policies, strong industry-standard encryption, and world-class data centers to ensure information we share with them is protected.

We utilize internal and external support to ensure data security, for example by keeping our virus protection software and firewall protection current, utilising encryption tools, and utilising IT security options available to us.

### **What will be the effect of this on the individuals concerned?**

There should be no impact on the individual as a result of our processing. We aim to always be fair, transparent and ensure that people know how their information will be used. Data security is a key consideration and we do everything we can to protect the data we hold.

This applies whether the personal data was obtained directly from the data subjects or from other sources.

### **Is the intended use likely to cause individuals to object or complain?**

Our use of data will not have any unjustified adverse effects on individuals. We are only using information in a way which they would expect.

There are no adverse consequences of not providing information to us - for example, non-receipt of a benefit.

### **The Lawful Basis of our data processing**

The lawful basis for our data processing activity are a combination of **Legitimate Interest and Contractual** for activities relating to staff, suppliers, existing customers and other stakeholders.

In general terms the purpose of processing information is to enable us to provide our service to customers, to support and manage our employees, and maintain our own accounts and records.

#### **Legitimate Interests:**

- We use people's data in ways they would reasonably expect in order to carry out our business and communicate with them.
- Processing is necessary as we could not provide consultancy services to new or existing customers without processing this information.
- We have balanced our commercial interests against the individual's interests, rights and freedoms. Our processing has a minimal privacy impact.

#### **Contract:**

- We have a contract with an individual and need to process their personal data to comply with our obligations under the contract ie employment contract, consultancy contract.
- We haven't yet got a contract with an individual, but they have asked us to do something as a first step (eg provide consultancy service information) and we need to process their personal data to do what they ask.



We will explain our lawful basis for processing personal data when we answer a 'subject access' request.

#### **Who the Data Controller / DPO is**

We have identified that it is not necessary for us to appoint a Data Protection Officer (DPO), however our Managing Director has overall responsibility for the control of data collected and held by us, and also monitors and maintains GDPR compliance.

Individuals have the right to request access to the data we hold on them by submitting a request to do so addressed to Managing Director, who will provide details on any information retained by us as outlined in our Data Protection Policy.

#### **Data Protection by Design and Data Protection Impact Assessments**

We aim to adopt a privacy by design approach and will carry out a Privacy Impact Assessment (PIA), also referred to as 'Data Protection Impact Assessments' (DPIA), as part of our GDPR compliance system in situations where data processing is likely to result in high risk to individuals, for example:

- where a new technology is being deployed;
- where a profiling operation is likely to significantly affect individuals; or
- where there is processing on a large scale of the special categories of data.

If a DPIA indicates that the data processing is high risk, and we cannot sufficiently address those risks, we will consult the ICO to seek its opinion as to whether the processing operation complies with the GDPR.

#### **The right to complain**

We always seek to treat an individual's data fairly, however, individuals have the right to complain to us and we will investigate and respond accordingly within one month. Complaints should be sent addressed to:

Managing Director

J P Feltham Associates Ltd PO Box 270, Gosport, PO12 9FH

Email: [jpf.accounts@btinternet.com](mailto:jpf.accounts@btinternet.com)

Should the response not be resolved to the satisfaction of the complainant, the individual can also take up their issue with the Information Commissioner's Office (the ICO) at the following address:

The Information Commissioner's Office,

Wycliffe House, Water Ln, Wilmslow SK9 5AF

Or via EMAIL: <https://ico.org.uk/global/contact-us/email/>

#### **Governing Law**

This <http://www.jpfeltham.com/> website is governed by the laws of England and Wales and any dispute in respect thereof shall be subject to the exclusive jurisdiction of the courts of England and Wales.

***Last Update March 2019***