

The Content Consultancy

PRIVACY NOTICE

This Privacy Notice contains important information about who I am and what I do with your personal data. It also explains your personal data rights and how you may contact me or the Information Commissioner's Office, if you have a concern or a complaint about how I am processing your personal data.

I do not ask for personal data unless I truly need it. If you volunteer personal information to me that I do not need I will only keep it if I need to, otherwise I will delete it. If you have any questions regarding how I process your personal data you may email me at kate@thecontentconsultancy.com or write to me at 6 Two Gate Meadow, Overton, Hampshire, RG25 3TG.

Given the nature of my business, my website is not intended for children and I do not expect to collect the personal data of anyone under 13 years old. If you are aware that any personal data of anyone under 13 years old has been shared with me (directly or via my website), please let me know so that I can delete that data.

WEBSITE:

<https://thecontentconsultancy.com/> is a website provided and controlled by me. I am also the controller of the personal data obtained via that website meaning I am legally responsible for deciding how and for what purposes that personal data is used.

Throughout my website I may link to other websites owned and operated by third parties, some of whom I have linked with to make additional products and services available to you. Third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third-party websites, please consult their privacy policies as appropriate.

My website uses cookies which are small text files placed onto your device (e.g. computer, smartphone or another electronic device) when you use my website. For further information on the cookies used by my website, please see my [Cookie Notice](#).

MORE ABOUT HOW I PROCESS PERSONAL DATA AND WHY

I am a UK based consultant offering goods and services to businesses and individuals based, in the main, in the United Kingdom. I do not actively offer goods and services to businesses based outside of the UK. If I process personal data of individuals based in the EU, it will likely be occasional and only for the administration of my business (such as invoicing or contacting an individual representing a client company).

I will always endeavour to adhere to the data protection legislation that is relevant to the businesses and individuals I am servicing and as a data controller based in the UK most of my personal data processing is governed by the UK General Data Protection Regulation (UK GDPR).

When I talk about personal data in this Notice, I mean any information relating to an identified or identifiable living individual. When I talk about special category personal data, I mean any personal data that might reveal racial or ethnic origin of an individual or their political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic data, biometric data and information concerning an individual's health, sexual orientation or sex life is also special category data.

The individual to whom the personal data relates to is known as a “data subject”.

PERSONAL DATA I COLLECT

In the main, there is no reason for me to collect or process special category personal data and the personal data I do collect will depend on the product or service I am being asked to provide to you. Typically, the personal data I collect and use will include:

- your name and contact information, including email address and telephone number and company details – this may also include your job title and where you are located for work.
- your professional online social media profile
- your billing information, transaction history and payment card information
- your contact history, webinar or event attendance history and any items marked as ‘saved’ on my website or other online platforms (including LinkedIn, Facebook and Instagram)
- information from accounts you link to me to which may include personal social media profiles
- information about how you use my website including the Clubbers area for The Content Club
- your responses to surveys, competitions and promotions

If you do not provide personal data I ask for, it may delay or prevent me from providing goods and services to you.

HOW I COLLECT YOUR PERSONAL DATA

In most cases, I will collect personal data from the data subject directly either because they have contacted me in person, by telephone, text or email and/or via my website. However, I may also collect personal data via:

- from publicly accessible official sources, e.g. Companies House – this will usually be in instances where I am contracted by a corporate body such as a Limited Liability Partnership or Limited Company and I want to understand who owns and controls that corporate so I can protect my legitimate interests;
- from publicly accessible social media sources, e.g. Facebook, LinkedIn, Instagram etc;

- from a third party with your consent – this might be where you have agreed to be referred to me by a mutual contact or where your details have been sent to me with your agreement by a collaborator; or
- from cookies on my website.

HOW AND WHY I COLLECT YOUR PERSONAL DATA

Under data protection law, I can only use your personal data if I have a proper reason, e.g.:

- where you have given consent;
- to comply with my legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for my legitimate interests or those of a third party.

A legitimate interest is when I have a business or commercial reason to use your personal data, so long as that reason is not overridden by your own rights and interests.

The table below explains what I use your personal data for and why.

What I use your personal data for	My reasons
Providing products and services to you	To perform my contract with you or to take steps at your request before entering into a contract
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with my legal and regulatory obligations —in other cases, for my legitimate interests, i.e. to protect my business, its interests and rights
Ensuring my business policies are adhered to	For legitimate interests such as to make sure I am following my own internal procedures so I can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For legitimate interests such as to ensure my business is as efficient as it can be so I can deliver the best service to you at the best price

What I use your personal data for	My reasons
Ensuring the confidentiality of commercially sensitive information	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —for my legitimate interests, such as protecting trade secrets and other commercially valuable information —to comply with my legal and regulatory obligations
Statistical analysis to help me manage my business, e.g. in relation to the financial performance of my business, to assess my client base and the efficiency of my service range	For legitimate interests such as to ensure my business is as efficient as it can be so I can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —for legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or me —to comply with my legal and regulatory obligations
Protecting the security of systems and data used to provide the goods and services	<p>To comply with my legal and regulatory obligations</p> <p>I may also use your personal data to ensure the security of my systems and data to a standard that goes beyond legal obligations, and in those cases my reasons are for my legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or me</p>
Updating and enhancing client records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform the contract with you or to take steps at your request before entering into a contract; —to comply with my legal and regulatory obligations;

What I use your personal data for	My reasons
	—for legitimate interests, e.g. making sure I can keep in touch with my clients and subscribers about existing orders and new products
Statutory returns	To comply with legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>Depending on the circumstances:</p> <p>—to comply with legal and regulatory obligations;</p> <p>—for legitimate interests, e.g. to make sure both myself and any staff / suppliers I engage to assist me are following internal procedures and working efficiently so I can continue to deliver the best service to you</p>
<p>Marketing my services and those of selected third parties to:</p> <p>—existing and former clients;</p> <p>—third parties who have previously expressed an interest in my services;</p> <p>—third parties with whom I have had no previous dealings.</p>	<p>For legitimate interests, i.e. to promote my business to existing and former clients.</p> <p>If you are a consumer I may rely on a “soft opt in” in order to send direct marketing to you. This means I will only send you marketing information that is similar to the products or services you have purchased from me previously or that you have enquired about previously. You may opt out from marketing at any time by contacting me by email (see above).</p>
<p>To share your personal data with third parties that will or may take control or ownership of some or all of my business (and professional advisors acting on my or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of my insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <p>—to comply with legal and regulatory obligations;</p> <p>—in other cases, for legitimate interests, i.e. to protect, realise or grow the value in my business and assets</p>

What I use your personal data for	My reasons
To communicate with you about matters not related to marketing, including about changes to my terms or policies or changes to the products or other important notices (other than those addressed above)	Depending on the circumstances: —to comply with legal and regulatory obligations; —in other cases, for legitimate interests, i.e. to protect, realise or grow the value in my business and assets

SPECIAL CATEGORY PERSONAL DATA

In order to deliver my goods and services I do not require special category personal data. Where this sort of personal data is processed, I will ensure it is only processed in instances where I am permitted under data protection laws such as:

- with your explicit consent;
- where the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- where the processing is necessary to establish, exercise or defend legal claims.

MARKETING

I may use your personal data to send you updates (by email, text message, telephone or post) about my goods and services, including exclusive offers, promotions or new goods and services.

I have a legitimate interest in using your personal data for marketing purposes which means I do not usually need your consent to send you marketing information. If I change my marketing approach in the future so that consent is needed, I will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting me at kate@thecontentconsultancy.com
- using the 'unsubscribe' link in emails or 'STOP' number in texts; or

I may ask you to confirm or update your marketing preferences if you ask me to provide further goods and services in the future, or if there are changes in the law, regulation, or the structure of my business.

I will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

SHARING YOUR PERSONAL DATA

I routinely share personal data with third parties I use or collaborate with, in order to deliver my goods and services. This may include payment service providers, venues (where I host events) and collaborators I work with to deliver exclusive content into The Content Club or other events / promotions. Where I collaborate with other businesses or professionals to provide specific goods and services, I will impose contractual obligations on them to ensure they can only use your personal data in accordance with this Privacy Notice.

I may also share your personal data with:

- other third parties I use to help run my business (e.g. remote personal assistant services, marketing agencies or website hosts)
- third parties approved by you (e.g. social media sites you choose to link your account to or third party payment providers)
- my professional advisors (legal and insurance) or bank who will be bound by confidentiality obligations imposed by a service contract and/or a regulatory authority
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with my legal and regulatory obligations
- other parties that have or may acquire control or ownership of my business (and my or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of my insolvency - usually, information will be anonymised but this may not always be possible although the recipient of any of your personal data will be bound by confidentiality obligations.

I will only allow those organisations to handle your personal data if I am satisfied they take appropriate measures to protect your personal data.

For subscribers (“Clubbers”) to The Content Club: I regularly hold webinars and meetings with Clubbers using Zoom or Google Meet. Both of these platforms require visibility of attendees by reference to their name and sometimes their contact information. I will not actively share contact details of Clubbers and all Clubbers should check their device settings to protect their personal data before logging on or dialling into a webinar or other remote conference/meeting. Clubbers should also bear in mind that by engaging in the various group chats and platform based messaging facilities operated exclusively for The Content Club that other Clubbers will have access to personal data such as names, email addresses and work / business information.

WHERE YOUR PERSONAL DATA IS HELD

Typically, I store personal data on a password protected device which is used for business purposes only, or on cloud-based solutions or platforms.

Hard copy documents containing personal information are securely kept at the address above.

I operate a Google Workspace account for the generation and storage of email communication as well as for storing and sharing documentation. This account operates pursuant to a Data Sharing Addendum which is a contract between myself and Google aimed at protecting your personal data and ensuring that my business adheres to its obligations under the UK data protection legislation. Further information is available at: <https://cloud.google.com/terms/data-processing-addendum/>

I also use Mailchimp to send email communications and Xero for invoicing and accounting. As with Google, both companies process personal data I share with them as a data processor meaning they may only process personal data pursuant to my instructions. The relationship is governed by appropriate contractual obligations designed to protect your personal data and ensure that my business adheres to the UK data protection legislation.

I use social medial platforms such as Facebook, LinkedIn and Instagram and this means that there may be instances where your personal data is held by those businesses if you have interacted with me using these platforms and/or their messaging facilities. You should look to how these companies process your personal data as an end user by referring yourself to their Privacy Notices. The accounts I operate on these platforms are however password protected and only I have access to them.

If I ever need to transfer your data outside of the UK (for storage or for other processing) I will only do so where I have a good reason and where the transfer is governed by an adequacy decision from the UK's Information Commissioner's Office or another approved vehicle such as standard contractual clauses which meet the requirements of the UK-GDPR. An adequacy decision is a finding that a specific jurisdiction offers levels of data protection that are essentially equivalent to the UK.

HOW LONG TO I KEEP YOUR PERSONAL DATA

I will not keep your personal data for longer than I need to. In order to protect myself and my business I may keep some of your personal data for up to 6 years. In the main, I will minimise the personal data I hold after expiry of 3 years of our last contact.

If you have made an unsolicited application for employment with me or you have responded to a specific vacancy advertisement, I will keep your CV and personal data for no longer than 6 months from the date of your application or rejection (whichever is the later).

YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require that I correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require that I delete your personal data (in certain situations this right may be overridden by another reason which allows me to keep your personal data such as legitimate interest or legal requirement in which case your data will be redacted to the minimum that is required to meet those obligations)
Restriction of processing	The right to require me to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to me, in a structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object at any time to your personal data being processed for direct marketing (including profiling) and in certain other situations the right to object to my continued processing of your personal data, e.g. processing carried out for the purpose of a legitimate interests
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consents	If you have provided a consent to use your personal data you have a right to withdraw that consent easily at any time. Withdrawing a consent will not affect the lawfulness of my reliance on that consent before it was withdrawn.

For more information on each of those rights, including the circumstances in which they apply, please contact me or refer to the following information published by the UK's Information Commissioner's Office:

<https://ico.org.uk/for-the-public/>

If you would like to exercise any of those rights, please email me at kate@thecontentconsultancy.com or write to me at 6 Two Gate Meadow, Overton, Hampshire, RG25 3TG.

You will not be charged for my time in responding to a request (within reason) and I will endeavour to let you have a response or a resolution to your enquiry within 30 days.

KEEPING YOUR PERSONAL DATA SECURE

I have security measures in place which are proportionate to my business and which offer reasonable security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. I limit access to your personal data to those who have a genuine business need to access it and I also have procedures to deal with any suspected data security breach.

I will notify you and any applicable regulator of a suspected data security breach where I believe that breach is likely to cause you or any other data subject significant harm or in other circumstances where I am legally required to do so.

If you would like to know more about protecting yourself online may I direct you to Get Safe Online which offers advice on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems (www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

HOW TO COMPLAIN

Handling other people's personal data is a privilege and one that I take particularly seriously. If you have any queries or concerns about my use of your personal data, I encourage you to make contact with me. If you are not happy with any explanation I have given to an enquiry or complaint resolution, you have the right to raise a complaint with the UK's Information Commissioner's Office:

The Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

CHANGES TO THIS NOTICE

This privacy notice was published on 4th October 2019 and last updated on 14th July 2023

I may change this notice time to time and when I do I will inform you via email or a notification on my website. You should check back at the online version of this notice from time to time:

<https://thecontentconsultancy.com/privacy-policy/>