**Privacy Policy**

Godstone Farm Limited are committed to protecting and respecting your privacy. This privacy notice sets out the ways in which we may process your personal data, your rights in relation to our processing and other matters. This privacy notice contains important details about the way we will treat your personal information, and your rights in respect of the personal data that we hold about you.

This notice applies to:

1. Any candidates who apply for a role with us
2. All Employees
3. All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business.

Any reference to ‘we’, ‘us’, ‘our’, ‘the company’ shall mean Godstone Farm Limited.

Any reference to ‘you’ or ‘Data Subject’ shall mean any individual for whom we hold personal data.

This Privacy Statement does not include information relating to the retention of data on limited companies because this type of data is not incorporated within the provisions of GDPR.

In most circumstances your data will be held by us as a “Data Controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you about the holding of information in this privacy notice. We may update this notice at any time.

**DATA PROTECTION PRINCIPLES**

We will ensure that your data is managed as confidentially and securely as possible. In relation to your personal data, we will:

* process it fairly, lawfully and in a clear, transparent way
* collect your data only for reasons that we find proper for the course of our relationship and in ways that have been explained to you
* only use your data in the way that we have told you about
* ensure it is correct and up to date
* keep your data for only as long as we need it
* process your data in a way that ensures it will not be used for anything that you are not aware of
* process your data in a way that ensures it will not be lost or destroyed

**THE TYPE OF INFORMATION WE HOLD ABOUT OUR CLIENTS AND OTHERS**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you apply for a role with us, we will ask you for information including:

* Name
* Address
* Email and other contact details
* Job history (including information relating to placements through us)
* Educational history, qualifications & skills
* Visa and other right to work or identity information
* Passport
* Contact details of referees
* Personal information relating to hobbies, interests and pastimes
* Information contained in references and pre-employment checks from third parties

As part of the scope of recruitment and employment we may collect additional personal data from you in order to work effectively with you. This information may include

* Date of birth
* Gender
* Marital status and dependants.
* Bank details
* National insurance and tax (payroll) information
* Next of kin details
* Other sensitive personal information such as health records (see ‘Sensitive Personal Data’ section below)

Some of the information you provide to us about you and others may be Sensitive Personal Data (such as your physical or mental health). We will treat all this with the highest level of confidence and security.

**WHY WE HOLD INFORMATION ON CLIENTS**

 It is necessary for us to retain data in order to fulfil our contractual obligations and we also hold data for legitimate business needs. We need to ensure that we manage our business successfully and can make effective decisions. To do this we will need to process your personal data in relation to specific activities (e.g. recruiting, scheduling appointments, planning sessions, marketing promotions, ensuring our systems are secure against unauthorised access and dealing with legal claims made against us).

We will only retain data which we reasonably require and for a period which is reasonably necessary. We will not disclose your data to the third parties unless you have consented for us to do so or we are otherwise required to do either contractually or under another law or enactment.

**HOW WE COLLECT & STORE PERSONAL INFORMATION**

We collect personal information about our you when you apply for a job role and complete relevant employment paperwork. We also collect data that is shared by our employees during the course of the employment relationship.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered with you or we may be prevented from complying with our legal obligations.

Employee and business data is stored within a GDPR compliant Microsoft O365 account with a mirrored copy of the data saved on our laptops, which are password protected.  We use some cloud based services for the management of our business, including Xero, Hubspot, Mailchimp and Eventbrite. All these applications are password protected and where possible we use two factor authentication. Data on our current clients that we are actively working with, is also stored on our mobile telephones, which is password encrypted.  If our coaching is carried out via video conference call (MS Teams, Zoom, Skype or a similar) contact data will be stored within the application for the duration that we are actively in a coaching relationship.

Without notification, we reserve the right to change the systems in which data is stored to another equivalent system but at all times we will ensure the appropriate security of your data and GDPR compliance.

**HOW WE WILL USE YOUR INFORMATION.**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

* To perform the contract we have entered into with you.
* To comply with a legal obligation.
* Where it is necessary for our legitimate interests

We may also use your personal information in the following situations, which are likely to be rare:

* Where we need to protect your interests (or someone else’s interests).
* Where it is needed in the public interest (or for official purposes).

In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

* Dealing with legal disputes involving you
* To prevent fraud
* To market our products or services which may be of interest to you
* To inform you about updates about our services
* To administer our business which may include disclosure of client data to our accountant and HMRC.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In certain circumstances listed above, we hold your data to market other services to you, send you inspirational blogs, or send you information that we think may interest you. We have a legitimate business interest in retaining your data for this purpose, but you may ‘opt out’ of receiving these types of communication from us.

We will only use your personal information for the purposes for which it was collected, 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 information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**SHARING PERSONAL DATA WITH THIRD PARTIES**

We will only share personal information with third parties where required to by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

**DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures may be obtained directly from us.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so. The transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with us by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

**DATA RETENTION**

**How long will I use your information for?**

We will only retain your personal information 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 your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

In respect of client data, you can expect us to hold data relating to your instructions for a period of seven years after completion of the last coaching interaction. The reason for this is that the Limitation Act 1980 typically provides that legal proceedings for breach of contract or negligence can be brought up to six years after the events. We therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings ensue.

Given the nature of our services, clients often return to us with repeat instructions within weeks, months or years of contacting us in the first instance. The seven-year period referred to above will start from the last contact we had with the client, third party or supplier, to ensure we are able to assist as and when we need to. Should you not contact us for seven years, we will confidentially destroy all data held for you.

**RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

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

You have a number of rights in relation to your personal data. You may:

* Request to see the personal data that is held – to do so, you should make a subject access request in writing. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
* Request correction of any personal data held by us in the event that there are inaccuracies
* Request deletion of any of your personal data held by us where you believe there is no reason for us to continue processing it. Data will be deleted where we no longer require to retain that personal data (e.g. for legal reasons)
* Object to processing of your personal data unless the processing is necessary for your relationship with us

Where you ask us to erase, correct, object to process or seek to restrict our processing of data we may refuse your request where we have a legal obligation, contractual or other legitimate business interest to refuse your request.

We may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You have the right to opt out of receiving marketing, networking information or information we think might be of interest to you.

**RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact havefun@godstonefarm.co,uk.  Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

**DATA PRIVACY MANAGER**

Nicola Henderson is appointed as Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact us at havefun@godstonefarm.co.uk. If you make a complaint then we will respond to let you know how your complaint will be handled.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (or such other regulatory or supervisory authority as may be appointed from time to time). Full details can be accessed in the complaints section of the ICO website <https://ico.org.uk/>