



**People & Organisational Development**

## **PRIVACY POLICY**

### **Introduction**

Halland Solutions Limited (trading as Halland Institute) is a provider of the following services:

- Management Consultancy
- Individual and Team Development
- Coaching
- Clinical Supervision
- Facilitation
- Training
- Speaking Engagements

We act as both a controller and processor of client data, and are responsible for that data as laid out in this policy. We are committed to complying with E.U. and U.K. data protection laws\* to the extent that they apply to our use of personal information.

### **Individual Right to Know**

- We take your privacy seriously and do not share your information with third parties for marketing purposes
- By using any forms on our website you are giving us your consent to use your personal data for periodic mailings
- We will retain your data until you instruct us to remove it or decide to unsubscribe from the mailing list
- Your personal data will be stored until you tell us otherwise
- In case you would like to exercise any of your GDPR related rights (the right to access, rectification, erasure, restriction or processing) please contact us via email: [hallandsolutions@gmail.com](mailto:hallandsolutions@gmail.com)
- You have the right to lodge a complaint with the UK supervisory authority, the Information Commissioner's Office, if you are unhappy about the way we hold and use your data
- If you wish to receive a copy of our Data Protection Policy please contact us via email, as above
- We will not use personal data for any other purpose than described in this policy.

### **Policy Details**

- We do not share any personal paper-recorded information we collect on our clients (such as coaching records) with any other organisation or individual
- Contact data of clients, including name, work email address and business telephone numbers, may be shared with Associates of Halland Solutions Ltd, as required in the course of conducting our business. This sharing of contact data is strictly for the purpose of relevant business activity and prohibited for other use
- Contact data of clients, including name, place of work and work email address are shared with the named sub-processors: OPP, JCA Global, Appraisal 360 to facilitate administration of psychometric tests

- Contact data of clients, including name, title, place of work, address and overview of services provided are shared with the named sub-processor: Xero, for the purpose of processing invoices; when PayPal is your choice of payment, contact data of name and overview of service provided is shared
- No personal information will be provided to other parties not listed in this policy except in the unusual event that we are required to do so by law
- By using any forms on our website, you implicitly agree to be bound by our privacy policy and legal disclaimer
- By using any forms on our website you agree to have your email address added to our mailing list
- By using any forms on our website you are giving us your consent to use your personal data for periodic mailings
- You may receive periodic mailings from us with information on services or news. If you do not wish to receive such mailings, please let us know by contacting us. All emails sent will give you the option to unsubscribe
- We take all reasonable precautions to protect any personal data that our users may input via our website. We cannot, however, be responsible for loss or misuse of personal data that is intercepted or otherwise accessed by unauthorised persons. We therefore exclude all liability for this
- You have the right to ask us for a copy of your personal data and have the right to amend or delete the data.

## Definitions

**Controller:** The Controller transfers personal data

**Processor:** The Processor receives and manages data

**Sub-Processor:** Third party providers with whom we share data to provide our services to you

**Personal Data:** Information regarding personal, identifying details

**Customer Data:** Data related to purchase of services

**Communication Data:** Communication that is received from clients through email or post

**Sensitive Data:** Personal information that includes details of race, ethnicity, sexual orientation, religious beliefs, political opinions, gender, philosophical beliefs, trade union membership, health, sex life, genetic and biometric data

## Data Collection

### **Personal data:**

Halland Solutions Ltd collects and uses personal information (also referred to as data) for a number of specific lawful purposes in the course of our business. Electronic information held about you may include:

- Name
- Email addresses – workplace and personal
- Place of work
- Organisation address
- Role title
- Telephone numbers – workplace and mobile
- Psychometric test results

Following verbal permission, paper records are maintained and securely held, of coaching sessions during the active phase of coaching and for five years post-coaching. These are then shredded. These records are held solely by the Coach for their personal use.

**Communication data:**

We hold information that you send us via email and post, for the purposes of communicating with you and for record keeping.

**Sensitive data:**

We do not collect any sensitive data.

**Customer data:**

We hold data relating to the purchase of our services, including: company name, contact personnel and titles, billing address, delivery address, email address, telephone number and purchase details. We process this data to supply the services purchased and to keep records of such transactions.

**Sub-Processor data share:**

Our sub-processors include: Xero, PayPal, OPP, Appraisal 360, JCA Global, Halland Associates. In addition, your data may be shared with auditors, insurers and Government bodies that require us to report processing activities.

**Data Processor Obligations**

We confirm that we will process personal data and take steps to ensure that any person acting under our authority, who has access to your personal data, does not process your personal data except on our instructions.

We will inform you if, in the Processor's opinion, any of the instructions regarding the processing of your personal data breach any applicable data protection laws.

We will ensure that all agents and contractors involved in the handling of your personal data are:

- Aware of the confidential nature of your personal data and are contractually bound to keep your personal data confidential
- Have received appropriate training on their responsibilities as a data processor
- Are bound by the terms of this agreement.

**Data Breaches**

A data breach may occur for a number of reasons, such as:

- Loss or theft of data or equipment on which the data is stored
- Unauthorised access to, or use of, information by a third party or other members of staff
- Loss of data resulting from an equipment or systems failure, including hardware and software
- Human error, such as accidental deletion or alteration of data
- Unforeseen circumstances, such as fire and flood
- Deliberate attacks on IT systems, such as hacking, viruses or phishing scams
- Misappropriation of data by deception.

In the event of a data breach that is likely to result in a risk to the rights and freedoms of individuals, or jeopardises an organisation, Halland Solutions Ltd will:

- Make the required report to the Information Commissioner's Office without delay and, where possible, within 72 hours of becoming aware of it
- Notify the affected individuals if a data breach requires them to be notified by law.

**\* Data Protection Act (DPA) 2018 and the General Data Protection Regulation (GDPR)      25 May 2018**