

Data Protection and Privacy Notice

Your personal data – what is it?

“Personal data” is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address or address). Identification can be by the information alone or in conjunction with any other information. The processing of personal data is governed by *the Data Protection Act 2018, the General Data Protection Regulation 2016/679 (the “GDPR”)* and other legislation relating to personal data and rights such as *the Human Rights Act 1998*.

Who are we?

This Privacy Notice is provided to you by Buonacorsi Consulting (also known as gillhow.com) which is the data controller for your data.

Buonacorsi is a company primarily specialising in the provision of Learning, Training, Coaching and Business Transformation. It does this in conjunction with its customers, clients, third party suppliers and accredited qualification providers; each of these will be data controllers for their own processing activities.

What data does Buonacorsi as the data controller process? Buonacorsi will process some or all of the following where necessary to perform its tasks:

- Names, titles, and aliases, photographs, video;
- Contact details such as telephone numbers, addresses, and email addresses;
- Where they are relevant to our business, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications, ethnicity, hobbies, family composition, and dependants;
- Where you pay for activities or services, financial identifiers such as bank account numbers, payment card numbers, payment/transaction identifiers, and purchase order numbers;
- We process Special Category data such as:
 - i) Ethnicity information which may be required for monitoring purposes, including by qualification awarding bodies.
 - ii) Information on special educational needs which may be required for the provision of an appropriately differentiated learning programme and for monitoring purposes, including by qualification awarding bodies.

How do we process your personal data?

The data controller will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

We use your personal data for some or all of the following purposes:

- To enable us to meet all legal and statutory obligations;
- To provide you with the services that we are contracted to provide;
- To maintain our own accounts and records;
- To process a donation or payment that you have made;
- To inform you and to seek your views or comments;
- To notify you of changes to our services and events;
- To send you communications which you have requested and that may be of interest to you;
- To process an application for a role;
- To enable us to provide or promote services as specified in our memorandum and articles of association;
- Our processing also includes audio and video recording and the use of CCTV systems for the provision of training and for archival purposes.

What is the legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party (such as another organisation or a qualification awarding body). We will always take into account your interests, rights and freedoms.

We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with an accredited qualification.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

Sharing your personal data

Your personal data will be treated as strictly confidential. It will only be shared with third parties where it is necessary for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with some or all of the following (but only where necessary):

- Your employer;
- Our agents, servants and contractors. For example, we may ask a commercial provider to send out newsletters on our behalf, or to maintain our database software;
- Qualification awarding bodies such as (but not limited to) ILM (Institute of Leadership and Management) and The City and Guilds Institute;
- On occasion, other suppliers with whom we are carrying out joint events or activities.

How long do we keep your personal data?

We will keep some records permanently if we are legally required to do so. We may keep some other records for an extended period of time. For example, it is current best practice to keep financial records for a minimum period of 7 years to support HMRC audits. In general, we will endeavour to keep data only for as long as we need it. This means that we may delete it when it is no longer needed.

Your rights and your personal data

You have the following rights with respect to your personal data:

When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.

1. The right to access information we hold on you
 - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
 - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
2. The right to correct and update the information we hold on you
 - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
3. The right to have your information erased
 - If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold.
 - When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
4. The right to object to processing of your data
 - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
5. The right to data portability
 - You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
6. The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
 - You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
7. The right to object to the processing of personal data where applicable.
8. The right to lodge a complaint with the Information Commissioner's Office.

Transfer of Data Abroad

Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union. Our website is also accessible from overseas so on occasion some personal data (for example in a newsletter) may be accessed from overseas.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the

relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Changes to this Notice

This Notice is subject to review and amendment without notice.

Contact Details

Please contact us if you have any questions about this Privacy Notice or the information we hold about you or to exercise all relevant rights, queries or complaints at:

The Data Controller, Buonacorsi Consulting, 15a The Avenue, Petersfield GU31 4JG or via the email contact link on the web site at <http://www.gillhow.com/contact/>

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.