

## Privacy Policy

### Introduction

eunice-aquilina consultancy Ltd T/A eaconsult & Stepping Into Your Power is committed to maintaining the trust and confidence of those we engage and work with. This policy describes how we ensure the privacy and security of your personal information; how we collect your personal information, how your data is handled and stored, your rights over any personal information we hold about you as well as how to make a complaint. This Privacy Policy has been updated on 20<sup>th</sup> August 2024 in compliance with UK data protection laws and regulations.

### Why this policy exists

This privacy policy ensures eaconsult:

- Complies with UK data protection laws, including the UK GDPR and follows good practice
- Protects the rights of our clients and partners
- Is open and transparent about how we store and process individuals' data

### Who's in charge of your data?

The controller of your data is eunice-aquilina consultancy Ltd and we can be contacted on: [eunice@eaconsult.co.uk](mailto:eunice@eaconsult.co.uk)

### Personal information we collect

This policy applies to all staff, suppliers and associates working on behalf of eaconsult. It applies to all data that the company holds relating to identifiable individuals, including the personal data of our clients. This can include:

- Titles and names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Photographs
- Information on an individual's specific needs relating to their access to a venue, their participation at an event or completing a profiling tool
- Results of personality profiling tools (MBTI, LDF)

**Special Category Data:** Sometimes during sessions with clients we may collect information about their physiological, psychological, behavioural historical or cultural data. This is categorised as special category data and so, we require your specific consent to process this type of data. When you submit your details, we will ask you to confirm your consent to this processing.

**Aggregated Data:** We do not collect or process aggregated data about our users, except for the purpose of analysing email newsletter statistics. This data is used solely to improve the content and relevance of our communications and is always anonymised.

### **How we use your information**

We process personal data only where the purposes are justified, on the basis of fulfilling our contracts with clients, and our legitimate interests in running and promoting the organisation. We will not send you marketing communication unless you have provided us with your explicit consent. The information we collect will be used as follows:

- **Making an enquiry via email or phone**  
If you contact us via email or phone to enquire about our services, we will only use your information to respond to your enquiry. We will hold your name, email and phone number on our database for a period of 12 months from the date of enquiry, after which it will be deleted.
- **Subscribing to our newsletter**  
We send out a quarterly newsletter, in which we share what we are up to, what is stimulating us, challenging us or inspiring us and invite your observations and stories. It also contains invitations to our events.

You may have subscribed to our newsletter while attending an event with us or engaged us to do a piece of work for you. We will never sell, trade or share your contact details with any other organisation or business. If you wish to change your contact details please contact [caroline.walker@eaconsult.co.uk](mailto:caroline.walker@eaconsult.co.uk)

If you no longer wish to receive our newsletter, you can unsubscribe via the link at the bottom of the newsletter or by contacting

Caroline Walker directly at the email address above.

- **Using our services**

If we have engaged in a piece of work with you, we will hold your details in order to provide these services and will only use those details to provide the service you have requested. The kind of personal information we hold will depend on the nature of the work we have been asked to do. For example, information relevant to developing your professional or leadership practice may include physiological, psychological, behavioural historical or cultural data.

- **Links to other websites**

This privacy policy does not cover the links to other websites referenced within our newsletter or website and we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. If you have questions about how a site uses your information, you will need to check the privacy statement applicable to the website in question.

- **Cookies**

Whilst we do not use traffic log cookies to identify which pages of our website are being used, we do use cookies to support the Vimeo service that we sometimes have available on our website.

Cookies help make our website work better for you, remembering your preferences and improving your experience. You can control cookie settings in your browser. Cookies make your browsing experience on our site as smooth as possible, because they remember your preferences.

Our website uses cookies to distinguish you from other users of our website. Please see our Terms and Conditions for more information.

### **How we secure your information**

We take seriously how and where your data is safely stored. Where data is stored on paper, it is kept in a secure place, in a locked cabinet, where unauthorised people cannot see it.

Data printouts are shredded and disposed of securely when no longer required.

When data is stored electronically, it is protected from unauthorised access, accidental deletion and malicious hacking attempts by:

- Data is protected by strong passwords that are changed regularly, and can only be accessed by a personal login.
- Data is only stored on designated drives and is only uploaded to an approved cloud computing services such as i-cloud and drop box.
- Data is backed up frequently and the back-up is held securely.
- All computers containing data are protected by approved security software.
- All data stored on computers is encrypted.

### **Do we ever share your personal data?**

We take your data's security seriously and only allow certain people to access it.

We may share your personal data with the parties set out below for the purposes as stated further above.

- Service providers, acting as processors who provide IT and system administration services, such as Mailchimp (for our email newsletters), Apple (for iCloud services) and Dropbox (for document storage).
- Associates who assist with our coaching services, acting as processors or joint controllers. If we use an associate for your work, then we will always send you an introduction email and explain that an associate is being used.
- Professional advisers, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities, acting as processors or joint controllers, based who require reporting of processing activities in certain circumstances.

All of the above third parties have a requirement to respect the security of your personal data. We do not permit them to use your personal data for their own purposes – they are only permitted to process your data for specified purposes in line with our instructions.

### **Do we ever transfer your data internationally?**

- We may transfer your data outside of the United Kingdom/EEA, but only when we can be sure it is protected.

- A few of our external third parties are based outside the United Kingdom/EEA and so their processing of your personal data will involve a transfer of data outside the United Kingdom.
- Whenever we transfer your personal data out of the United Kingdom, we make sure it is protected by at least implementing one of the following safeguards:
  - We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the United Kingdom
  - Where we use certain service providers, we may use specific contracts approved by the UK Information Commissioner's Office and the European Commission which give personal data the same protection it has in Europe.
- Please contact us if you want further information on the specific process used by us when transferring your personal data out of the United Kingdom.

### **How we ensure your data is accurate**

We take reasonable steps to ensure data is kept accurate and up to date, these include

- Data is held in as few places as necessary.
- We take every opportunity to ensure data is updated.
- Data is updated as inaccuracies are discovered.

### **What is our process for retaining your data?**

We only keep your data as long as necessary for the reasons we collected it. For example, at the end of a coaching assignment, we shred any paper files after 6 months for coaching and coaching supervision clients and 12 months for consultancy work.

By law we have to keep basic information about our customers (including contact information, identity details, financial information and data relating to your transactions with us) for six years after they cease being customers for tax purposes.

For information that does not fall under the definition of basic, to determine the appropriate retention time, we look at what kind of data it is, how sensitive it is, the risks if it's misused, why we need it, and if there are other ways to achieve the same goals. We also consider applicable legal, regulatory, tax, accounting and other requirements.

### Your rights

- **Right to access and rectification**  
You have the right to access the personal information that we hold about you; this is called a 'Subject Access Request'. Subject access requests from individuals should be made by email, addressed to [eunice@eaconsult.co.uk](mailto:eunice@eaconsult.co.uk). We will aim to provide the relevant data within a calendar month. If personal data is incomplete or incorrect, you can ask us to correct it.
- **Right to erasure**  
You have the right to request us to delete or remove your personal data.
- **Objection**  
In certain situations, you have the right to object to the processing of your personal data.
- **Restriction of Processing**  
You can request that we restrict the processing of your personal data under specific circumstances.
- **Data Portability**  
You have the right to request the transfer of your personal data directly to you or to a third party of your choice.
- **Withdrawal of Consent**  
At any point where we rely on your consent to process your personal data, you have the right to withdraw this consent. Withdrawal of consent will not affect the legality of the processing done before the consent was withdrawn. Should you withdraw your consent, we might be unable to provide you with certain products or services. We will inform you if that is the case when you withdraw your consent.

### Contact us or file a complaint

If you would like to exercise any of your data protection rights, please

contact Eunice Aquilina at [eunice@eaconsult.co.uk](mailto:eunice@eaconsult.co.uk).

We won't charge any fees for you to request access to your personal data. However, a reasonable fee may be charged if your request is clearly unjustified, repetitive or excessive. We also reserve the right to not comply in this scenario.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you are not happy with how we have managed your personal information you can lodge a complaint directly to the Information Commission Officer (ICO) at: <https://ico.org.uk/global/contact-us/>

We regularly review our privacy policy. Please keep us updated if your personal data changes. If you have any questions or need to exercise your rights, just get in touch.

### **Data protection law**

For the purpose of the General Data Protection Regulations 2018 eunice-aquilina consultancy ltd is a company registered in England and Wales under company number 06621486. We are registered with the Information Commissioner's Office.