

Privacy notice - professional services

Rebecca Walker HR Ltd customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain

Contact details

Email

rebecca@rebeccawalkerhr.co.uk

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Occupation
- Employment details (including salary, sick pay and length of service)
- Information relating to compliments or complaints
- Audio recordings (eg calls)
- Records of meetings and decisions

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details

We collect or use the following personal information for **information updates or marketing purposes**:

- Names and contact details
- Addresses

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Payment details
- Account information
- Purchase or service history
- Video recordings of public areas
- Video recordings of private or staff only areas
- Call recordings
- Witness statements and contact details
- Photographs
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests are:

- Rebecca Walker HR Ltd has a legitimate interest in collecting and using personal information that is necessary to provide professional HR consultancy services to clients and to manage and improve those services. This information is needed to understand clients' requirements, provide appropriate advice and support, maintain relevant records, communicate with clients and record meetings, decisions and actions where appropriate. The processing benefits clients by allowing Rebecca Walker HR Ltd to provide an effective, professional and tailored service and to maintain an accurate record of the work undertaken. The information collected will be limited to what is reasonably necessary for these purposes and will only be used where relevant to the services being provided. Personal information will be handled securely and will not be retained for longer than necessary. The processing is not expected to cause significant impact or harm to individuals because only information necessary for the consultancy service will be collected and used, and it will not be used for unrelated purposes.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests are:

- Rebecca Walker HR Ltd has a legitimate interest in collecting and using personal information to manage and maintain its relationships with clients and to provide an effective and professional service. This information is necessary to communicate with clients, maintain accurate client records, manage services provided and respond to client enquiries. The benefits of processing this information are that clients can be contacted and supported effectively, their records can be kept accurate, and the services provided can be managed appropriately. The information collected will be limited to what is necessary for these purposes and will not be used in ways that would be unexpected or unfair to individuals. Appropriate measures will be taken to keep personal information secure and it will not be retained for longer than necessary.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests are:

- Rebecca Walker HR Ltd has a legitimate interest in using names, contact details and addresses to communicate with existing and prospective clients about its HR consultancy services, including relevant business information and updates. This processing is necessary to allow the business to identify and communicate with organisations and individuals who may be interested in its services and to maintain appropriate business communications. The information used will be limited to what is reasonably necessary for these purposes. Contact will be relevant and proportionate to the nature of the business and services offered, rather than indiscriminate. Individuals will not be contacted where they have asked not to be, and any objections to direct marketing will be respected. Personal information will be handled securely and will not be retained for longer than necessary. The benefit to Rebecca Walker HR Ltd is being able to communicate with potential and existing clients and develop its business. The impact on individuals is expected to be low because the information used will be limited and communications will be

relevant to the recipient's business or relationship with Rebecca Walker HR Ltd. Individuals will also retain the right to object to direct marketing.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

Our legitimate interests are:

- Rebecca Walker HR Ltd has a legitimate interest in collecting and using personal information to deal with queries, complaints and claims, including investigating the circumstances of a matter, establishing relevant facts, responding appropriately and protecting the interests of both the business and the individuals involved.

This may include keeping relevant correspondence, records of meetings and decisions, call recordings, photographs, witness information and other relevant evidence where necessary. The processing is necessary to enable Rebecca Walker HR Ltd to properly investigate and respond to queries, complaints or claims and, where appropriate, to establish, exercise or defend its legal rights. Information will only be collected and used where it is relevant and necessary to the matter being considered and will not be used indiscriminately.

The benefits are that individuals can have their concerns properly investigated and responded to, while Rebecca Walker HR Ltd can maintain an accurate record of events and protect itself against unfounded or disputed complaints or claims.

The potential impact on individuals will be considered carefully, particularly where information is sensitive or obtained from third parties, and appropriate safeguards will be used. Personal information will be kept secure and retained only for as long as necessary.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Publicly available sources
- Third parties:
 - Other individuals who provide personal information about someone else, such as providing contact details for a person who has asked them to make an introduction or enquiry on their behalf.

How long we keep information

Personal information will be retained for as long as it is necessary for the purpose for which it was collected. For ongoing clients, relevant personal information will be reviewed and updated as appropriate throughout the client relationship.

Where a client relationship ends, or there has been no further engagement, information will be reviewed in accordance with our retention schedule and securely deleted when it is no longer required, unless there is an ongoing business, legal or other legitimate reason to retain it. Contact information will normally be securely deleted two years after the last engagement with the client.

Different retention periods may apply to particular types of information, including financial records, complaints or claims, call recordings, and personal information processed on behalf of clients, where applicable legal requirements or contractual arrangements determine the retention period.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: rebecca@rebeccawalkerhr.co.uk

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>