



## Privacy Policy

(Last update: 29 September 2018)

### 1. About us

L&M Plus Consulting Limited is committed to the privacy of personal data and this 'Privacy Policy' ("Policy") sets out how we handle your personal data securely and in accordance with your rights.

The terms of this Policy may change from time to time. If we make changes we will notify you by updating the Policy on our website <https://www.lmplusconsulting.com>.

In the context of this Policy, L&M Plus Consulting Limited is both the 'Data Controller' of the personal data you provide to us, and we will sometimes refer to ourselves in this Policy as "we", "us" or "our".

The term Data Controller means that L&M Plus Consulting Limited determines the purposes and way in which any personal data you provide to us is, or will be, processed.

We are registered with the UK Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)) which is our lead data protection supervisory authority. Our data protection registration number is ZA133919.

Should you need to contact us regarding this Policy or the matters it refers to please email [zoryna.odonnell@lmplusconsulting.com](mailto:zoryna.odonnell@lmplusconsulting.com) quoting 'Privacy Enquiry' as the subject, or write to Data Protection Officer, L&M Plus Consulting Limited, 54 Winston Road, Newport, Isle of Wight PO30 1RG UK.

### 2. Personal information we may collect

Personal information may be collected through use of the company website or through other points of contact relevant to L&M Plus Consulting Limited activities you wish to engage with.

For example, we collect personal information when you:

- deal with us in person or by telephone, email or letter in order to purchase products or services from us;
- make an enquiry by completing a contact form on our website;

- register to attend an event;
- register for learning and development activity;
- submit any other information in connection with the purchase of our products and services.

The types of personal information collected will be relevant to the product or service.

Information collected/requested may include your title, first name, surname, gender, age and your preferred contact details (telephone, street address, email address).

If relevant to the product or service being provided, we may also collect information about your mental and physical health and emergency contact details.

When purchasing a product or service for which payment is being made through debit or credit card or via direct debit arrangements, details relating to your debit or credit card or bank account will be collected and temporarily stored until we have processed your order and the selected payment method is completed.

We also collect information about your visit to our websites and the devices you use to access them (desktop and mobile), and this may include an IP address. This information is used to help us follow browsing preferences on our websites so we can improve them and enable more advanced features to enhance the user experience. Further information on our use of cookies and tracking is covered in our 'Cookie notice' (section 9) below.

### 3. How we use your information

Data protection legislation says that we are allowed to use and share your personal data only where we have a proper reason to do so. The law says we must have one or more of the following reasons:

- **Contract** – your personal information is processed in order to fulfil a contractual arrangement, for example, in order to provide you with products and/or services you wish to purchase from us.
- **Consent** – where you agree to us using your information in a particular way, for example, for marketing preferences and to receive newsletters.
- **Legitimate Interests** – this means the interests of L&M Plus Consulting Limited in managing our business to allow us to provide you with the best products and service in the most appropriate and secure way, for example, to transfer your data to certain Third Parties such as sub-contractors or delivery partners.
- **Legal Obligation** – where there is statutory or other legal requirement to share the information, for example, when we have to share your information with a regulatory body or for law enforcement purposes.
- **Vital Interests** – where we need to process the personal data to protect someone's life.
- **Public task** – where we need to process personal data 'in the exercise of official authority' (this covers public functions and powers that are set out in law); or to perform a specific task in the public interest that is set out in law.

Using those reasons as appropriate to each circumstance, personal information may be collected and handled by L&M Plus Consulting Limited for the following purposes:

- to provide you with products and services you expect us to;
- to best tailor resources and website content according to your preferences and your internet enabled device;
- to respond to requests or questions when you contact us;
- with your consent we may also use your contact data to inform you about services, products, events, etc that might be of interest to you, via email, telephone, SMS/text or mail;
- with your consent we may send to you newsletters that may be of interest;
- to help us create, publish and improve content to enhance its relevance;
- to allow you to participate in interactive features of our website when you choose to do so;
- to transfer data to third parties where relevant (see section 7 below);
- to comply with any legal obligation where necessary; and
- we may also process your information to:
  - a. investigate or respond to incidents and complaints
  - b. comply with obligations and rights and cooperate with investigations carried out by the police, government or regulators.

Personal information may be used to send direct marketing via email and other communication means when you opt-in for this purpose in the relevant contact form. You may opt-out of receiving future marketing communications at any time by emailing [zoryna.odonnell@implusconsulting.com](mailto:zoryna.odonnell@implusconsulting.com) quoting 'Unsubscribe' as the subject (see section 13 below for more details).

#### **4. Do you have to give us the personal information we ask for?**

You are not obliged to provide your personal information to us when generally navigating our website; however, we cannot fulfill any specific requests for information or provide you with specific products or services unless you do so.

In order to provide you with certain services we may need to collect personal data which data protection legislation regards as sensitive or special categories of personal data, for example, information relating to your physical or mental health. By completing and signing our intake form for the services you have purchased from us, you will signify your explicit consent to such sensitive data being processed by us.

Any such information provided will be held in the strictest confidence and used only for the purpose stated.

#### **5. Do we process information using automated systems/processes without human intervention?**

L&M Plus Consulting Limited does not use automated systems/processes and automated decision-making (for example, profiling) for the provision of its services to you.

## **6. How long we keep your information for?**

If we collect your personal information, the length of time we retain it is determined by a number of factors, including the purpose for which we use that information and our obligations under relevant legislation.

We may need your personal information for legal, accounting or regulatory purposes. For this purpose we will retain your personal information for 8 years after the date it is no longer needed by us for any of the purposes listed under 'How we use your information' (section 3 above).

The only exceptions to this are where:

- the law requires us to hold your personal information for a longer period or to delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

## **7. Sharing your information with third parties**

To facilitate our efficient use of your information, and to provide you with content and/or services, or to fulfil a request you make of us, we may disclose your information to third parties. However, this disclosure will only occur in the following circumstances:

- To suppliers, contractors and agents: from time to time we may engage or employ other companies and individuals to perform functions on our behalf. Examples include the provision of services in the capacity of a sub-contractor or delivery associate. Such third party recipients will be subject to contractual confidentiality obligations issued to them by L&M Plus Consulting Limited.
- To technology suppliers: for example, relating to the hosting and/or maintaining of website content or the provision of certain features contained on our website. In such circumstances your personal information remains under the control of L&M Plus Consulting Limited and we ensure that adequate controls are in place (including contractual obligations on the technology supplier) to ensure your personal information is secure.
- To government or law enforcement authorities: if we determine, in our sole discretion, that L&M Plus Consulting Limited is under a legal obligation to do so.

Third party recipients will only have access to your personal information as required by them to perform their relevant functions and they are not permitted to use such personal information for any other purposes or for general marketing to you.

## **8. Transfers to third countries**

Information you provide to us will not as a matter of course be transferred outside the European Economic Area (i.e. transfer to a “third country”). Where transfers of data to third countries are identified as necessary for the limited purpose of providing you with the services you expect us to, we shall only transfer your data to countries which the European Commission believes offers an adequate level of protection to personal data.

## **9. Cookie notice**

We collect information about your computer, including (where available) your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and we will not use it in isolation to identify you or any individual.

The L&M Plus Consulting Limited website is based on a content management system and, for the website to function, certain other cookies may be stored temporarily on your computer. In particular, “first party session cookies” - a small amount of text stored in the user's computer that is created by the website the user is visiting. By default, first-party cookies are allowed in every Web browser. If you were to disable first-party cookies, a website could not keep track of your activity as you move from page to page. They are required to ensure correct functioning of the website and are not used for any other purpose.

You have the ability to accept or decline cookies by modifying the settings in your web browser; however, you may not be able to use all the features of the L&M Plus Consulting Limited website if cookies are disabled. For information on how to disable cookies, please consult the "Help" tab of your browser via the menu bar.

The information stored in cookies is safe and anonymous to any external third party.

You can find more information about cookies at <http://www.allaboutcookies.org/> and [www.youronlinechoices.com/](http://www.youronlinechoices.com/) .

Please check our Cookies Policy which explains what cookies are, how we use cookies, how third parties we may partner with may use cookies on our website, your choices regarding cookies and further information about cookies.

## **10. Data Security**

We will use operational procedures and technical and organisational security measures to mitigate any unauthorised access, change, deletion or transmission of your personal information. Although we do our best in this way to protect your personal information, you should be aware that the transmission of information via the internet is not completely secure and we cannot guarantee the security of your personal information transmitted by you to L&M Plus Consulting Limited via email address or website or any third party; for this reason, any such transmission is at your own risk.

## **11. Links to other websites**

The L&M Plus Consulting Limited website may contain links to other websites of interest. However, you should note that we do not have any control over such websites and we cannot

be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should therefore look at the privacy statements applicable to any such websites as appropriate.

## 12. Your rights regarding access, correction and deletion of personal information

Under applicable data protection laws you are entitled to request the following:

- **Right of access** (to request access to your personal information and information about how it is processed);
- **Right to rectification** (to have your personal information corrected if it is inaccurate and to have incomplete personal information completed);
- **Right to erasure** (also known as the Right to be Forgotten, however this is subject to any legal rights or obligations we may have to retain data);
- **Right to restriction** of processing of your personal information;
- **Right to data portability** (to electronically move, copy or transfer your personal information where appropriate);
- **Right to object** to processing of your personal information;
- **Rights with regards to automated individual decision making**, including profiling.

These are called your Data Subject Rights and there is more information about them on the Information Commissioner's Office website [www.ico.org.uk](http://www.ico.org.uk). To exercise your rights, you can email us at [zoryna.odonnell@lplusconsulting.com](mailto:zoryna.odonnell@lplusconsulting.com) quoting 'Data Subject Rights' in the subject line of your email.

You may choose to complete a Data Subject Access Request Form (Appendix 1 below) if you want us to supply you with a copy of any personal data we hold about you. Please note that the completion of this form is not compulsory. However, it provides you with the detail of what information we require from you in order to process your Data Assess Request as quickly and efficiently as possible. There is a small fee (£10) for processing your request to supply you with a copy of any personal data we hold about you, which is applied to all such requests regardless of whether or not you choose to use the form in Appendix 1.

To the extent that processing of your personal information is based on your consent, you have the right to withdraw your consent at any time. Withdrawal of your consent will not affect the lawfulness of any processing based on your consent before the receipt of such withdrawal.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country where you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in the UK, are available on the website [www.ico.org.uk](http://www.ico.org.uk). However, if you believe that your personal information has been or is being used by L&M Plus Consulting Limited in a way that does not comply with data protection regulations, we encourage you to contact us before making any complaint and we will endeavour to directly resolve any issues or concerns you may have.

### 13. Keeping in touch with you

We want to keep you up to date with information relevant to the services and products you have enquired about and/or purchased from L&M Plus Consulting Limited . We will only send communications to you via email or other means where specified as your contact preference.

On the forms we use to collect your personal information we will usually offer you a check/tick/click box where you can indicate your contact preferences for the type of marketing communications you want to receive.

Where we send marketing communications to you via email, you may opt-out of receiving future individual marketing communications at any time by emailing [zoryna.odonnell@lplusconsulting.com](mailto:zoryna.odonnell@lplusconsulting.com) quoting 'Unsubscribe' as the subject, or by clicking the 'unsubscribe' function in the email if it has this function enabled.

You can also exercise your opt-out right at any time by emailing [zoryna.odonnell@lplusconsulting.com](mailto:zoryna.odonnell@lplusconsulting.com) quoting 'Opt-out' as the subject and providing the following information: your name, your email address, a contact telephone number, the communications you would like to opt out of receiving. It may take up to 10 working days from receipt of your request for this to take place and you may receive further communications in the intervening period while your request is being actioned.

### 14. Contact

Should you need to contact us please write to: Data Protection Officer, L&M Plus Consulting Limited, 54 Winston Road, Newport, Isle of Wight PO30 1RG UK. or via [zoryna.odonnell@lplusconsulting.com](mailto:zoryna.odonnell@lplusconsulting.com) quoting 'Privacy Enquiry' as the subject.

## Appendix 1.

# DATA SUBJECT ACCESS REQUEST FORM

You may choose to complete this form if you want us to supply you with a copy of any personal data we hold about you.

**Please note** that the completion of this form is not compulsory. However, it provides you with the detail of what information we require from you in order to process your Data Assess Request as quickly and efficiently as possible.

You are currently entitled to receive this information under the Data Protection Act 1998 (DPA) and will continue to be under the EU General Data Protection Regulation (GDPR), which comes into effect on 25 May 2018.

We will also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data, and any rights to rectification, erasure, or restriction of processing that may exist.

We will endeavour to respond promptly and in any event **within one month** of the latest of the following:

- Our receipt of your written request with the required **proof** of your identity and of your address, and **payment of the fee (£10)** for processing your request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in this form will only be used for the purposes of identifying the personal data you are requesting and responding to your request.

**Please note:** You are not obliged to complete this form to make a request, but doing so will make it easier for us to process your request quickly.

### SECTION 1: Details of the person requesting information

|                          |  |
|--------------------------|--|
| Full Name                |  |
| Address                  |  |
| Contact telephone number |  |
| Email address            |  |

### SECTION 2: Are you the data subject?

Please tick the appropriate box and read the instructions which follow it

- YES:** I am the data subject. **I enclose proof of my identity** (see below).  
**(Please go to section 4.)**
- NO:** I am acting on behalf of the data subject. **I have enclosed the data subject's written authority and proof of the data subject's identity and my own identity** (see below). **(Please go to section 3.)**

To ensure we are releasing data to the right person we require you to provide us with proof of your identity and of your address.

**Please supply us with a photocopy or scanned image (do not send the originals) of the following:**

- Proof of Identity** - passport, photo driving licence, national identity card, birth certificate;  
**and**
- Proof of Address** - utility bill, bank statement, credit card statement (no more than 3 months old); current driving licence; local authority tax bill, HMRC tax document (no more than 1 year old).



**Please note:** If we are not satisfied you are who you claim to be, we reserve the right to refuse to grant your request.

**SECTION 3: Details of the data subject** (if different from section 1)

|                          |  |
|--------------------------|--|
| Full Name                |  |
| Address                  |  |
| Contact telephone number |  |
| Email address            |  |

**SECTION 4: What information are you seeking?**

Please describe the information you are seeking. Please provide any relevant details you think will help us to identify the information you require.

**Please note** that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request, we nevertheless reserve the right, in accordance with section 8(2) of the DPA, not to provide you with copies of information requested if to do so would take “disproportionate effort”, or in accordance with Article 12 of the GDPR refuse the request if it is considered to be “manifestly unfounded or excessive”. However we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

### **SECTION 5: Information about the collection and processing of data**

If you want information about any of the following, please tick the boxes:

- Why we are processing your personal data
- How we are processing your personal data
- To whom your personal data are disclosed
- The source of your personal data

### **SECTION 6: Declaration**

**Please note** that any attempt to mislead may result in prosecution.

I confirm that I have read and understood the terms of this subject access form and certify that the information given in this application to L&M Plus Consulting Limited is true.

I understand that it is necessary for L&M Plus Consulting Limited to confirm my/the data subject’s identity and it may be necessary to obtain more detailed information in order to locate the correct personal data.

Signed..... Date .....

Documents which must accompany this application:

- Evidence of your identity (see section 2)
- Evidence of the data subject’s identity (if different from above)
- Authorisation from the data subject to act on their behalf (if applicable)

**Please return the completed form to:**

Data Protection Officer / Company Director  
L&M Plus Consulting Limited  
54 Winston Road, Newport, Isle of Wight, UK

Email: [zoryna.odonnell@lplusconsulting.com](mailto:zoryna.odonnell@lplusconsulting.com)

Phone: 07846569445

### **Correcting Information**

If after you have received the information you have requested you believe that:

- the information is inaccurate or out of date; or
  - we should no longer be holding that information; or
  - we are using your information for a purpose of which you were unaware;
  - we may have passed inaccurate information about you to someone else;
- then you should notify our Data Protection Officer at once.