



# LEADENHALL

## **GDPR Policy – Leadenhall Consulting Ltd (Written May – 2018, revised 2021 to include Coaching on Demand)**

### *1. Introduction and Background*

The introduction of GDPR in May 2018 has implications for the Leadenhall Consulting business. This policy aims to summarise the data that we legitimately use for business purposes and how we should store that data and how long we should legitimately retain that data.

Article 5 of the GDPR requires that personal data shall be:

“a) processed lawfully, fairly and in a transparent manner in relation to individuals;

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

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## 2. *Data at Leadenhall Consulting*

We have audited our activities and we have a number of activities which require individual data which we believe are required for legitimate business purposes:

Those activities are:

- Sales and Marketing. We need to identify potential clients and communicate with them. This may include occasional newsletters, updates on the business or invitation to events that they would be interested in.
- Working with clients and their employees. Undertaking our coaching and consulting work with clients requires having data about the people and firms that we are working with. This will include people who are commissioning work from us, people who are being coached, data as part of a consulting project and information for sending and following up on invoices or other processes.
- Coaching on Demand. Provision of coaching via an online portal.

Examples of information that we have identified that are in pursuit of our legitimate activities are:

- Contact details on our clients, coachees, potential clients, suppliers, associates, partners and our network. Typical details include name, job title, email address and phone numbers. They kept digitally on our laptops, the cloud and specific cloud based, password protected, filing areas (dropbox). They include our personal contact lists (apple), on spreadsheets, on third party systems Eventbrite, Survey Monkey, Mail Chimp, TypeCoach (saved lists), on our CRM Simple Systems and in our email systems. They are on our Coaching on Demand platform.
- Psychometric reports. We use psychometric reports as part of our business. We use instruments primarily from Hogan, TypeCoach, Wiley which contain computer scored results from questionnaires which are naturally private and only shared with the individuals and authorised individuals from the companies they work with.
- 360 Feedback instruments. We occasionally work with 360 type instruments and often they are provided to us by clients.

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- CV's from clients (as part of leadership assessment) and from potential employees.
- Data on employees shared with Leadenhall Consulting as part of a consulting project. Usually in the form of excel or word documents. These are kept in dropbox, in outlook or on the cloud.

### *3. Ensuring Compliance with GDPR*

It is important that Leadenhall Consulting and Coaching on Demand complies with GDPR. Staff and Associates should seek to follow the following guidelines:

- 3.1 When receiving information staff and associates should consider whether information is required for the legitimate purposes of the business, as defined earlier in this policy. If the data is not required it should be deleted and not stored in any capacity.
- 3.2 If data is required for the legitimate purposes it should be retained for the period that we are working with the client and a reasonable period following work. Our policy is that any data that contains personal data is deleted within six months of the completion of the assignment.
- 3.3 Contact details which have been shared directly with us by clients or prospective clients (e.g. business cards, signature data on emails, data provided for events – Eventbrite) may be entered into the CRM system.
- 3.4 When sending marketing emails via Eventbrite, Mailchimp etc there should be an unsubscribe facility. If a contact unsubscribes we will ensure that they are not contacted again on such mailings.
- 3.5 Email accounts should be regularly reviewed to ensure that there are no attachments which contain personal information beyond the legitimate use of the email. We would suggest that six months following sending or receiving the mail would suffice. If an attached document is required for ongoing business purposes, save it to a safe, password protected area on the cloud or laptop.
- 3.6 When sending documents which contain personal data (spreadsheets, PowerPoints, word documents etc.) password protect the documents and send the password separately.

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- 3.7 If a client asks us to comply with their GDPR requirements the documentation should be forwarded to Chris Woodman who will review and sign as appropriate on behalf of Leadenhall Consulting.
  - 3.8 If an individual or client contacts you to request destruction of information or data that you or we hold as a result of legitimate business with that client or individual you should contact Chris Woodman. We would seek to comply with that request.
  - 3.9 If you believe there has been a breach of data security (e.g. stolen laptop, hacking etc) involving Leadenhall Consulting client data you should contact us immediately. We will contact and inform the client as a matter of urgency.
  - 3.10 It is impossible to state all examples of data control but the general principle should be 'has this person given us information to enable us to contact or work with them on legitimate business purposes', is the place of storage safely password protected and when should this information legitimately be deleted because the legitimate business purpose has expired.
4. The Data Controller for GDPR purposes is Chris Woodman. If you have any questions concerning the use of data on projects conducted under the Leadenhall Consulting banner then you should contact him.

Chris Woodman  
Managing Director

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