

Client and contact privacy notice

Sutton-McGough Solutions Ltd (trading as Sutton-McGough and SMS Education) is committed to protecting and keeping confidential all information you provide to us, subject to certain legal responsibilities set out below.

We ask that you read this Privacy Notice carefully as it contains important information about us, how and why we collect, store, use and share personal data, your rights in relation to your personal data, and how to contact us if you have a complaint.

Date of Policy:	Effective from 1 st September 2022
Reviewed by:	James McGough
Next Review due by:	1 st September 2023



About us

Sutton-McGough Solutions Ltd is a company registered in England No 10374371. Our Registered Office is 36 Ropergate, Pontefract, West Yorkshire, WF8 1LY. We collect, use and are responsible for certain personal data about you. When we do so, we are regulated by the Information Commissioner under the Data Protection Act 2018 (DPA) and UK General Data Protection Regulations (GDPR), and responsible as a controller and processor of that personal data.

Full name of legal entity:	Sutton-McGough Solutions Ltd.
Name of data privacy manager:	Dr, Julia Sutton-McGough
Email address:	admin@sutton-mcgough.co.uk

Your personal data and how we collect and use it

We process personal data about the following categories of people:

- Clients
- Potential clients
- Other people involved in client work
- Referrers of work and agencies
- Other third parties (including our staff/Associates) we have business relationships with

We collect data about you through a variety of different methods, including:

- Direct interactions, for example by you communicating with us by post, phone, email or otherwise or via our website and social media
- When you enquire about our services
- Engage us to provide services
- Provide us with feedback

On engagement and while providing services to you we collect, use, store and transfer the following personal data when you provide it to us:

- Name, address, date of birth, contact information (e.g., telephone and email), National Insurance number and financial data (where appropriate)
- Identity information and documentation (where appropriate)
- Additional information to enable us to perform our contract with you.
- We may also process sensitive personal data for the purpose of undertaking DBS or other related checks for the engagement of associates who work with us. In respect of providing education related services, we may on occasions also process data relating to children. When processing sensitive personal data, we will ensure we take appropriate measures to protect the security of that data.

We use your personal data primarily for the performance of our contract with you and identification of associates engaged by us. We also use your personal data for related purposes, including maintaining and updating current and previous work records, business analysis, and for statutory returns and legal and obligations. We may also record video calls, with your consent, for the purpose of report writing. Data information will be held in hard copy and/or electronic format.

You are responsible for ensuring the accuracy of all the personal data you supply to us, and we will not be held liable for any errors unless you have advised us previously of any changes in your personal data.



If you fail to provide personal data – where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

Why we process your personal data

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- To perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override these interests
- Where we need to comply with a legal or regulatory obligation
- Your consent

We may process your personal data on more than one lawful ground, depending on the specific purpose for which we are using your data.

Below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To process and deliver our services to you, including: (a) Manage payments (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you, which will include: (a) Notifying you about changes to our terms or privacy policy/notice (b) Asking you to leave feedback or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services



Cont. ...

Purpose/Activity	Type of data	Lawful basis for processing
To deliver relevant content to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	(a) Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests to develop our products/services and grow our business

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground for processing

We may process your personal data without your knowledge or consent where this is required or permitted by the law.

Disclosing your personal data

When we process and use the personal data of our clients, potential clients, other business contacts and third parties, we may need to share that personal data either internally or with external third parties, such as:

- Suppliers and service providers used by us in providing our services to you, including document storage systems, identity verification service providers, outsourced administration service providers, client relationship management, IT service providers (including cloud-based providers of software services), data room providers and debt recovery service providers
- H M Revenue & Customs, regulators, insurers, auditors (such as Ofsted) and other authorities based in the UK and other relevant jurisdictions who require reporting or processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and comply with their obligations under data protection law. We only allow such third parties to process your personal data for specified purposes and in accordance with your instructions.

We may transfer, store and process your personal data outside of the UK with your consent, or if we are required to do so by law.



How long will we keep your personal data

We will retain your personal data including your name and contact details plus your file of papers and /or electronic records for a period of time, depending on the nature of the services we provide to you. This is generally for a period of 2 years after the conclusion of those services. We will confirm this to you when the services you have engaged us for are concluded. After this period of time, your file of papers including the electronic records will be destroyed confidentially, without reference to you, unless we contact you to confirm other arrangements, or you contact us to request your file of papers at an earlier date.

In order to meet our legal obligations, we may be required to retain basic information about you to include your name and contact details on our electronic database for a longer period of time

About your rights

It is important that the information we hold about you is accurate and up to date. Please keep us informed if there are changes to the personal information that we hold about you.

By law you have the right to:

- Request access to your personal data, which is referred to as a “data subject access request”. This allows you to receive a copy of the personal data we hold about you and check we are processing it lawfully
- Request the correction of personal data we hold about you. This enables you to correct any incomplete or inaccurate information we hold about you
- Request erasure of your personal data. This enables you to remove or erase your personal data where there is no good reason for us continuing to process it. Please note we may be unable to erase personal data where we have an ongoing legal obligation to process it. Where we do erase your personal data, we will retain a record of your name, the date of your request and the date the data was erased.
- Object to processing your personal data (where we rely on legitimate interest or those of a third party) and there is a particular reason regarding your situation for you to object. Where we process your personal data for direct marketing, you also have a right to object.
- Request a restriction of processing your personal data. This enables you to request a suspension in processing your personal data.
- Request the transfer of your personal data to another party.

If you wish to inform us of any changes, object, withdraw consent for us processing your personal data or access the information we hold about you, please contact Dr Julia Sutton McGough, whose details are below under “Contacting us”. Please note in some cases we may not be able to delete, correct, restrict or grant an objection to processing your personal data if we have a legal obligation, legitimate interest or contractual reason to process it. If we refuse such a request, we will advise you, together with your right of appeal.

If you are requesting access to your personal data, please also let us have sufficient information to identify you (including proof of your identity and address – e.g., a copy of your passport, driving licence and a recent utility bill or bank or credit card statement). You should also let us know the information to which your request relates. This request is free of charge unless the request is manifestly unfounded or excessive.

Keeping personal data secure

We are committed to ensuring that your information is secure. To prevent unauthorised access, disclosure, or accidental loss, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect and hold. We limit access to your personal data to those who have a genuine business reason to know it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.



Making a complaint

We hope that we can resolve any query or concern you raise about our use of your personal data.

Data Protection law also gives you right to lodge a complaint with the Information Commissioner, who is the supervisory authority for data protection in the UK. They may be contacted at www.ico.org.uk or telephone 0303 123 1113.

Contacting us

Please contact Dr Julia Sutton-McGough, Sutton-McGough Solutions Ltd, 36 Ropergate, Pontefract, West Yorkshire, WF18 1LY. Telephone: 07766 657298; Email admin@sutton-mcgough.co.uk if you have any questions about this notice, or the information we hold about you.

If you would like this notice in a different format, please let us know.

Changes to this Data Protection Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Thank you for taking the time to read this policy.

