

---

**ANDY BRAITHWAITE CONSULTING LTD**  
**PRIVACY POLICY**

---

**BACKGROUND:**

Andy Braithwaite Consulting Ltd understands that your privacy is important to you and that you care about how your personal data is used. This Privacy Policy sets out the types of personal information we collect, how we collect and process that information, who we share it with in relation to the services we provide, and certain rights you have.

Please read this Privacy Policy carefully and ensure that you understand it.

**1. Information About Us**

This website, [www.andybraithwaite.com](http://www.andybraithwaite.com) ("Our Site") is owned and operated by Andy Braithwaite Consulting Ltd, a limited company registered in England under company number 14278665.

Registered address: 128 City Road, London EC1V 2NX.

**2. What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as "any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier".

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, location data, and other online identifiers.

**3. Third parties' data and third party websites**

If you provide personal information to us about any person other than yourself, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our third party service providers, to use it.

Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

**4. What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.
- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 10.

## 5. **What Personal Data Do You Collect and How?**

We may collect some or all of the personal data set out below. We do not place cookies on your computer or device.

Our Site collects certain information automatically, including your IP address, the type of browser you are using, geographic data, and certain other non-personal data about your computer or device such as your operating system type or version.

In dealing with us, we may collect personal information on you such as:

- Identifying and contact information including your name, job title, telephone number, address, your email address, social media accounts, identity documents such as passports, driving licence and utility bills and any other information which you choose to give us.
- Marketing information including your business activities, details of the services we provide to you and hobbies and interests.
- Business information including your business interests, appointments and shareholdings.

- Query information including data supplied by you when submitting enquiries to us and information which is necessary for us to carry out our services.

For the purposes of the Data Protection Legislation, we are the data controller responsible for such personal data.

We collect personal data from you in these circumstances:

- When you or your organisation seek services, including advice or coaching from us.
- When you correspond with us by phone, email or other electronic means, or in writing, or when you provide other information directly to us.
- When you or your organisation browse or interact on our Site.

## 6. **How Do You Use My Personal Data?**

The lawful bases under the Data Protection Legislation that allow us to use such information are:

- consent: where you have given us clear consent for us to process your personal information for a specific purpose.
- contract: where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- legal obligation: where our use of your personal information is necessary for us to comply with the law (not including contractual obligations).
- legitimate interests: where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

The following describes how we may use your personal data:

- Providing services: we will use and disclose personal data in such a manner as we believe is reasonably necessary to provide our services, to liaise with other professional service providers in relation to work that we are handling, or because we need to liaise with the other parties on work you have asked us to advise on.
- Managing client and contact relationships: providing clients and business contacts with information on our services and updates that we consider may be relevant to them; arranging and hosting meetings and events; and identifying where we may make improvements in service delivery.

Where we collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 7, below.

No personal data will be retained for any longer than is necessary.

## 7. **How and Where Do You Store My Data?**

We will store your personal data principally in the UK.

From time to time, we may need to transfer your personal data to external service providers and business partners, who may have offices that are located in countries outside of the UK. We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

Personal data security is essential to us, and to protect personal data, we take the following measures:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you or the Information Commissioner's Office where we are legally required to do so; and
- we have in place appropriate technical and organisational security measures to protect your personal data against unauthorised or unlawful use, and against accidental loss, damage or destruction.

## 8. **Do You Share My Personal Data?**

On occasion, we may need to share your personal data with third parties. We will only share personal data where we are legally permitted to do so.

Where you supply us with personal data as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your personal data in such manner as we believe is reasonably necessary to provide our services (including as described in this Privacy Policy), or as is required under applicable law.

If any of your personal data is transferred to a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 7.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

## 9. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "data subject access request".

All data subject access requests should be made in writing and sent to the email or postal address shown in Part 10.

There is not normally any charge for a subject access request. If your request is "manifestly unfounded or excessive" (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your data subject access request within one month of receiving it.

Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

10. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: andy@andybraithwaite.com

Postal Address: 128 City Road, London EC1V 2NX.

11. **Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated in September 2023.