

# Sophie Lovejoy

coaching | facilitation & learning | organisational development  
www.sophielovejoy.co.uk

## Data Protection Statement

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Effective date: 30th June 2025

Last updated: 30th June 2025

I provide consultancy and contractor services to Higher Education including organisational development, learning and facilitation and coaching.

I take privacy very seriously and therefore take steps to safeguard all the information given to me that enables me to provide this service effectively. This statement describes what information I have, how it is collected and why, what it is used for, how it is stored, your rights in relation to it, and how you can exercise them. It is reviewed annually and updated to reflect current UK data protection law.

I operate as a sole trader. If you have any questions or concerns, or would like to exercise your data protection rights, please do not hesitate to get in touch. My contact details are:

Sophie Lovejoy  
9 South Lodge, Fareham PO15 5NQ  
07725 122888  
sophie.lovejoy@gmail.com  
sophielovejoy.co.uk

ICO Registration number: ZA891992

You can also complain to the ICO if you are unhappy with how I have used your data:

Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
Helpline number: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

### *Principles*

- Only necessary data will be collected and processed
- You have the right to remove any information I may hold about you
- I will never sell, rent, make public or distribute your personal information
- I will never send irrelevant spam emails
- All processing is carried out in accordance with UK data protection law

### *The type of information I have*

My aim is to use and keep the minimum amount of personal data necessary to run my business effectively. The data I do collect, keep and use is that necessary to facilitate working relationships, to fulfil contractual and legal obligations, and to follow up afterwards to evaluate its effectiveness for you and any learning for me.

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Typically, that will include:

- Names, organisational roles and contact details of individuals with whom I interact
- Email correspondence and meeting records
- In the case of coaching clients, coaching design briefs and diagnostic reports

### *Professional development records and feedback*

These data are held electronically on password-protected computers. Remote back-ups are encrypted and stored on data security compliant sites.

I will hold such data for the duration of our business relationship (including any subsequent reviews) and then for a further six years in case I need to re-engage with any of the issues, which occasionally happens and in accordance with professional indemnity requirements. Beyond that, all data will be securely deleted.

Under the UK General Data Protection Regulation (UK GDPR), as amended by the Data (Use and Access) Act 2025, the lawful basis I rely on for processing this information is:

- Consent where you have given clear consent for me to process your personal data for specific purposes
- Contract where processing is necessary for the performance of a contract with you
- Legitimate interests where processing is necessary for my legitimate business interests, except where such interests are overridden by your interests or fundamental rights and freedoms

You can remove your consent at any time where consent is the lawful basis for processing. Please see the section on your data protection rights below.

### *In the event of a data security breach*

According to the ICO, a personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is accidentally lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

In the event that the personal data I store is subject to a data security breach, I will follow the current ICO guidance and UK GDPR requirements:

- Report to the ICO: I will notify the ICO without undue delay and, where feasible, not later than 72 hours after becoming aware of the breach, unless the breach is unlikely to result in a risk to your rights and freedoms
- Notify affected individuals: If the breach is likely to result in a high risk to your rights and freedoms, I will inform you directly without undue delay
- Provide information: I will share the information I have available about what has happened and any potential risks with those affected
- Advise on protective measures: I will advise individuals who may have been affected (in particular to be aware of the risk of phishing scams)
- Mitigation steps: Where appropriate, I will share any steps I am taking to mitigate the impact of the data breach
- Documentation: I will maintain records of all breaches in accordance with UK GDPR requirements

## *Your data protection rights*

Under UK data protection law, you have rights including:

- Your right of access - You have the right to ask me for copies of your personal information. I must respond without undue delay and in any event within one month of receiving your request. I will conduct a reasonable and proportionate search to locate your information.
- Your right to rectification - You have the right to ask me to rectify information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete.
- Your right to erasure - You have the right to ask me to erase your personal information in certain circumstances, such as where the data is no longer necessary for the original purpose or where you withdraw consent.
- Your right to restriction of processing - You have the right to ask me to restrict the processing of your information in certain circumstances, such as where you contest the accuracy of the data.
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances, particularly where processing is based on legitimate interests.
- Your right to data portability - You have the right to ask that I transfer the information you gave me to another organisation, or to you, in certain circumstances where the processing is based on consent or contract and is carried out by automated means.
- Your right to complain - You have the right to make a complaint to the ICO about how I process your personal data. You can contact them using the details provided above.

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you. Please contact me directly using the contact information above if you wish to make a request.

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*This statement complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. It is reviewed annually to ensure continued compliance with UK data protection law.*

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Next review date: June 2026