

## **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND THEIR STAKEHOLDERS**

### **1. Introduction**

Millins-Horne Consulting is committed to protecting and respecting the privacy of clients and their stakeholders. This Notice explains how Millins-Horne Consulting collects, store, process, and share personal data in compliance with the UK GDPR and applicable data protection legislation.

This Notice applies to all personal data collected in the course of providing consulting, training, and advisory services. By providing personal data to us, you agree to its collection and processing as described herein.

#### **Data Controller Contact:**

Jackie Millins-Horne

Email: Jackie@M-HConsulting.co.uk

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### **2. Definitions**

- **Data Subject:** A living individual whose personal data is processed.
  - **Data Controller:** The person or organisation that determines the purposes and means of processing personal data.
  - **Data Processor:** The person or organisation that processes personal data on behalf of a controller.
  - **Personal Data:** Any information that identifies an individual directly or indirectly, including names, work emails, IP addresses, geolocation, and photographs.
  - **Special Categories of Personal Data:** Sensitive data including health information, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, trade union membership, genetic or biometric data.
  - **Processing:** Any operation on personal data including collection, storage, use, transfer, or deletion.
  - **Third Party:** Any natural or legal person, public authority, agency, or body other than the data subject, controller, or processor.
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### **3. Who Millins-Horne Consulting Are**

Millins-Horne Consulting provides advisory and consultancy services across multiple sectors, including safety, safeguarding, construction, and infrastructure. Millins-Horne Consulting acts primarily as a **data processor**, processing personal data only under the instructions of the client.

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#### 4. Purposes of Processing

Millins-Horne Consulting processes personal data for the following purposes:

1. Communicating with clients and stakeholders via work emails.
2. Reviewing and consulting on occupational health and risk assessments.
3. Handling confidential data such as witness statements and insurance claims.
4. Managing complaints related to workplace health, safety, or environmental concerns.
5. Collecting and processing data for safety training reports and risk profiles.
6. Promoting services through photographs of training or consultancy sessions (with explicit consent).
7. Website analytics using cookies, IP addresses, geolocation, and unique identifiers to improve user experience.

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#### 5. Categories of Personal Data

- **Personal Data:** Name, work email, photographs, IP address, geolocation, unique identifiers.
- **Special Categories:** Health, injury, medical conditions, and wellbeing information.
- **Source:** Data is collected from client contacts or directly from the data subject, as instructed by the client.

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#### 6. Legal Basis for Processing

##### a) Personal data (article 6 of GDPR)

The lawful basis for processing general personal data:

Consent of the data subject	Included on the client's GDPR consent forms and through o Millins-Horne Consulting's own privacy notice and client contract
Contract	Processing is necessary for the contract entered into with Millins-Horne Consulting
Vital interests	Processing is necessary to ensure the safety and well being of client's employees and their stakeholders
Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the	Photographs of training sessions and consultancy work for the promotion of the business via the website and social media, IP addresses and geo date for the

interests or fundamental rights or freedoms of the data subject	improvement of client experiences on the website
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## b) Special categories of personal data (article 9 of GDPR)

### The lawful basis for processing special categories of data:

Explicit consent of the data subject	Included on the client's GDPR consent forms and through Millins-Horne Consulting's own privacy notice and client contract
Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	For safety practices, investigations and insurance guidance (HSE/POLICE/LITIGATION CLAIMS)
Contract	Processing is necessary for the contract entered into with Millins-Horne Consulting
Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	Processing is necessary to offer guidance and support to the individual and client as required by the contract with the Client
Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity	For safety practices, investigations and insurance guidance (HSE/POLICE/LITIGATION CLAIMS)
Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional	Processing is necessary to offer guidance and support to the individual and client as required by the contract

## 7. Storage and Retention

Millins-Horne Consulting retains personal data only for the period necessary to fulfil contractual obligations, legal requirements, or legitimate business interests.

### Retention schedule:

Category of Data	Retention Period	Disposal Method
Training photographs	10 years	Secure deletion/shredding
Health & risk assessments	7 years	Secure shredding or encrypted deletion
General correspondence	10 years	Secure shredding or encrypted deletion
Website analytics	2 years	Automatic anonymisation or deletion

Data is protected via:

- Encrypted storage on secure servers, cloud platforms, and laptops
- Access limited to authorised personnel
- Secure disposal (cross-shredding, permanent deletion)

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## 8. Data Sharing

- Millins-Horne Consulting does not sell or rent personal data.
- Data is shared **only with authorised third parties**: regulators, law enforcement, or processors under contractual obligations.
- Any external transfer is protected by **Data Processing Agreements**.
- Explicit consent is obtained for promotional material use, including names or images on websites and social media.

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## 9. Data Subject Rights

Data subjects have the right to:

1. Access personal data.
2. Correct inaccuracies.
3. Request erasure.
4. Withdraw consent at any time.
5. Restrict processing.
6. Object to processing based on legitimate interests or direct marketing.
7. Data portability.
8. Be notified of breaches impacting personal data.

## **DSAR Procedure:**

- Requests made via email to Jackie@M-HConsulting.co.uk
  - Identity verification is required.
  - Response timeframe: 1 month (extendable to 2 months if complex).
  - Records of all requests and responses are maintained.
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## **10. Transfer of Data Abroad**

- No direct personal data from clients or stakeholders is transferred outside the EEA.
  - Website hosting or social media data recipients may be outside the EEA; transfers only occur to countries approved by the European Commission or under **Standard Contractual Clauses**.
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## **11. Automated Decision Making**

- No personal data is processed through automated decision-making or profiling.
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## **12. Further Processing**

- Any new purpose requires a new notice explaining the purpose, legal basis, and rights of the data subject prior to processing.
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## **13. Data Breach Management**

- Millins-Horne Consulting is trained to report breaches immediately.
  - Breach response procedure:
    1. Contain the breach.
    2. Assess impact on individuals.
    3. Notify the ICO within 72 hours if required.
    4. Notify affected data subjects if high risk.
  - Breach logs are maintained for inspection.
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## **14. Changes to this Notice**

- Updates will be posted online and communicated via email if material.
- Version control and effective date are maintained.

## 15. Complaints

- Contact Jackie Millins-Horne: Jackie@M-HConsulting.co.uk
- If unresolved, complaints can be made to the ICO:
  - Phone: 0303 123 1113
  - Email: <https://ico.org.uk/global/contact-us/email/>
  - Address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Version	Date	Details	Author	Review
7	28/01/26	Full rewrite	JMH	Jan 27