



Privacy Policy

Holly Palmer Consulting is the only specialist alumni and supporter experience agency in the UK for education development. Our consultants combine industry knowledge with advanced skills in data analytics and visualisation, process improvement, database management and audience research to help schools and universities understand their alumni and supporters, measure their performance, and make stronger connections.

Information we collect

We may hold and process the following types of personal data:

- Our clients' business contact details (e.g. email and postal addresses, phone numbers)
- Personal contact details of our clients' alumni and supporters (e.g. email and postal addresses, phone numbers, business details)
- Personal information relating to our clients' alumni and supporters (e.g. gender, age, academic qualifications, memberships, donation information, philanthropic interests, relationships)
- Personal contact details of subscribers to our newsletters

How we gather this information

We gather data personal data in the following circumstances:

- Client and potential client contact details are gathered via online and telephone enquiries, or when we connect with new contacts at events or via social media



- Subscribers' details are gathered when they sign-up to receive a specific newsletter on our website
- Information relating to clients' alumni and supporters are supplied to us by our clients in order to undertake agreed services
- Further information relating to our clients' alumni and supporters may be gathered via surveys and focus group sign-up forms that we create

How we use data

In pursuit of our business interests we use data in the following ways:

- We use client and potential client business contact details for one-to-one contact in relation to services and potential services, but we do not undertake mass-marketing activities using business contact details that have not been provided to us for this purpose
- We use subscribers' details to send e-newsletters to which these individuals have signed up, and these details are not used for any other purposes
- Depending on the services we have agreed to provide to clients, we may process alumni and supporter details provided to us to:
 - Analyse and visualise audience behaviour, as well as demographics and attitudinal information (sometimes for the purpose of identifying potential donors and volunteers)
 - Restrict access to surveys we design by generating a unique hyperlink per subject, and/or prepopulate surveys with respondent information



- Personal contact details and other personal information we gather directly from alumni and supporters will be used according to the privacy notice linked at the beginning of each survey. This might include analysing and visualising audience behaviour, as well as processing demographics and attitudinal information (sometimes for the purpose of identifying potential donors and volunteers)

How we protect data

Personal information provided to us by clients or gathered by us in our surveys is stored in a cloud environment, Office365.

This environment has the following security controls:

- For data at rest, volume-level and file-level encryption is used
- For data in transit, multiple encryption technologies for communications between data centres and between clients and servers is used, such as Transport Layer Security (TLS) and Internet Protocol Security (IPsec)
- All data is stored on servers located in the UK
- For more information please follow [this link](#)

No personal information is stored or processed outside of this cloud environment, and all of our equipment is password protected.

We use either Qualtrics ([security statement](#) and [privacy policy](#)) or Survey Gizmo ([security statement](#) and [privacy policy](#)) for our online surveys. We use Mailchimp to send our e-newsletters ([security statement](#) and [privacy policy](#)).

How we share data



We will only accept personal information from clients via Secure File Transfer Protocol (SFTP), and we'll only send it using the same method.

How long we keep data

We retain personal data for 6 months, unless otherwise advised by our clients.

The legal basis for processing data

Holly Palmer Consulting Ltd is the Data Controller for the personal data we hold. We rely on two grounds for lawful processing:

- For the purpose of administering contracts with clients, to the extent that we process personal data we do so because it is necessary for the administration of a Contract
- Where we are communicating with e-newsletter subscribers, we rely on Consent to do so. This consent can be withdrawn at any time.
- When processing results from online and paper surveys during the course of our client work, we rely on Consent to do so. This consent can be withdrawn at any time.

What happens in the event of a data breach

In the unlikely event of a data breach, we will immediately investigate the details of the breach. We will undertake the following steps:

- Inform internal parties and clients of the breach within 24 hours
- Determine the volume and types of data affected by the breach
- If the initial investigation confirms that a breach has taken place, advise the ICO within 72 hours



- If high risk, notify individuals affected in partnership with client (if needed)
- Keep a record of personal data breaches
- Make improvements to data security as required to avoid future instances

Rights

You have a number of rights in respect of your data:

- If we are processing data with your consent then you have the right to withdraw that consent without prejudice
- You have the right to request a copy of any data we hold about you or to request that we correct any incomplete or inaccurate data
- You have right to request the transfer of your data to another party
- You have the right to complain to the Information Commissioner about the way in which we have processed data. Contact details are at www.informationcommissioner.org.uk

Contact details

Contact us with any queries about your data or this Privacy Policy at:

Holly Palmer Consulting Ltd
15 Ridgeway Gardens
Ottery St Mary
EX11 1DU

Email: hello@hollypalmerconsulting.com



Changes to this Privacy Policy

We reserve the right to update this Privacy Policy at any time. Any changes to this Privacy Policy will be posted to our website.

Last revised: September 2018