



## Privacy Policy

### Who are we?

Matthew Pollard trading as The Fourth Lever, of Brooklyn, Hele Lane, South Petherton, Somerset, TA13 5DY, who can be contacted by post at this address, or by email at [matthew@thefourthlever.uk](mailto:matthew@thefourthlever.uk).

We are an independent consultant providing our services only to other businesses and not to private individuals.

### What information do we collect, use, and why?

To provide and improve our services, we collect or use names and contact details of our clients', prospective clients' and related third parties' representatives with whom we communicate. We also retain records of:

- meetings and decisions,
- service history, including advice given and supporting evidence,
- information relating to queries, compliments and complaints, and
- correspondence.

Our services will often involve processing personal data on behalf of our client, including data relating to their clients or employees, terms regarding which will be set out in a Consultancy Agreement. Our client shall remain the Data Controller and we will refer any queries made to us regarding such data to them. Wherever possible, we prefer such data stays within our client's environment.

### Lawful bases and data protection rights

UK data protection law requires that we have a "lawful basis" for collecting and using personal information, and UK GDPR sets out a list possible lawful bases. You can find out more about these on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are outlined in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website.

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right [here](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right [here](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. You can read more about this right [here](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. You can read more about this right [here](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. You can read more about this right [here](#).

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right [here](#).
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right [here](#).

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice. If you make a request, we must respond to you without undue delay and in any event within one month.

## **Our lawful bases for the collection and use of your data**

Our lawful bases for collecting or using personal information to provide and improve products and services for clients are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Keeping a record of advice provided by us and to whom allows us to monitor and improve and, where required, to provide information to our insurers, legal representatives or a court of law.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Keeping a record of all queries, complaints or claims allows us to monitor and improve and, where required, to provide information to our insurers, legal representatives or a court of law.

## **Where we get personal information from**

Directly from our clients, prospective clients or their business contacts (including their customers/suppliers).

## **How long we keep information**

Where we have provided services, we will retain information relating to those for as long as required to meet any legal obligations or to address any possible complaint or claim being brought in relation to our services.

Contact details are retained until it is apparent we will no longer be likely to use them or they become invalid (such as if a client’s employee leaves them).



## **Who we share information with**

We share personal information only with organisations we're legally obliged to share it with.

## **How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO using the following details.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
  
0303 123 1113  
  
<https://www.ico.org.uk/make-a-complaint>