**1. Purpose of this Privacy Notice**

Pathway Consultancy Ltd will be referred to in this privacy notice as " Pathway Consultancy Ltd " / "**We**" / "**Our**" / "**Us**". We are committed to ensuring that your privacy is protected.

We are committed to protecting your personal data, Our notice below states how We collect, store, and use personal data.

This Privacy Notice sets out how We collect personal information from you and how the personal information you provide will be processed by Us.

# **2. Information About us**

Our Site is owned and operated by Pathway Consultancy Ltd, a Company incorporated in England and Wales. Our Company number is 15002281

Pathway Consultancy Ltd is the data controller when it uses your information for these company purposes. Its registered address is:

West Walberton Farm, West Walberton Lane, Walberton, Arundel, BN18 0QS

Any questions in relation to Data Protection should be directed to the Administration Officer (see the Section “How to Contact Us”).

**3. What Data Do We Collect?**

We collect personal information you give Us when you:

* Contact details such as name, address, email address, and phone numbers
* Date of birth
* Gender
* Information you provide when you correspond with Us
* Financial information that you provide to Us
* Order products and services from Us
* Use our products, services and website
* Provide a testimonial or a review on Our website
* Communicate with or contact Us
* Interact with Us on social media platforms
* Sign up to one of Our newsletters or other communications
* Request a call back through Our websites
* Otherwise interact with Us or provide information to a third party to be referred to Us
* Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
* Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from the website (including date and time), products you viewed or searched for, page response times, website errors, length of visits to certain pages, page interaction information, methods used to browse away from the page and any phone number used to call Our office.

**Third parties**

Our privacy notice does not apply to information processed by Our business partners or other third parties. Our website may contain links to websites which We do not own or control. This privacy notice does not apply to these third-party websites or applications that are accessible from, or referenced on, Our website.

**4. Cookies**

The Website uses cookies to distinguish you from other users of the website. For detailed information on the cookies, we use and the purposes for which we use them, please see this websites Cookie

The information we receive and/or collect about you may be used to:

* Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website

#  **5. Lawful basis for processing**

We will only use your personal data when the law allows Us. Most commonly, we will use your personal data in the following circumstances:

* Where We need to perform the **contract,** we are about to enter or have entered with you.
* Where we need to comply with a l**egal or regulatory obligation**.
* Where it is necessary for our **legitimate interests** (or those of a third party) in providing Our services to you and your interests and fundamental rights and not overridden by those interests.
* We rely on **consent** as a legal basis for processing your personal data in relation to sending marketing communications to you via email. You have the right to withdraw consent at any time by contacting the Us, although this will not prevent processing where the law allows us to process for a different reason in addition to consent.

# **6. How do We use the information about you**

We process your personal data to manage the services We provide you, to carry out our obligations arising from any contracts entered between Us and you, to provide you with information or services you have requested and to process payments and refunds.

**7. How do We protect your data**

Data security is of great importance to Us, and to protect your data We have put in place suitable physical, electronic, and managerial procedures to safeguard and secure data collected through Our Site.

We will do our best to protect your personal data but the transmission of information via the Internet is not completely secure. Any such transmission is, therefore, at your own risk.

Where we engage third parties to process personal data on our behalf, they do so upon writing and are contracted to implement appropriate technical and organisational measures to ensure the security of data.

**8. Where We Store your Personal Data**

The data that we collect from you may be transferred to, and stored at, a destination outside the UK. By submitting your personal data, you agree to this transfer, storing or processing.

Pathway Consultancy Ltd will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

**9. How long do We keep your data**

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will only keep your information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, contractual or reporting requirements.

**10. How do We share your data**

We are committed to not sharing your data and will only do this if it is in your legitimate interest to ensure We provide you with the support and information required to make an informed decision about our product(s).

We will not sell your data to any unconnected third parties.

We may contract with third parties to supply products and services to you on our behalf. These may include payment processing and the delivery of goods.

We may also have to share your personal data with the parties set out below.

* Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide legal, consultancy, banking, insurance and accounting services.
* HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.

# **11. How Can You Control Your Data**

When you submit information via Our Site, you may be given the ability to opt out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails or by emailing us.

You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

You may restrict your Internet browser’s use of Cookies. For more information, see Our Cookie Policy

You may withdraw your consent for Us to use your personal data at any time by contacting Us and We will delete Your data from Our systems. However, you acknowledge this may limit Our ability to provide the best possible products and services to you.

**12. Summary of Your Rights**

As a data subject, you have several rights and control over how your data is used.

* You can request access to, deletion of, or correction of, your personal data held by Us.
* You can ask for a copy of the data you have given Us.
* You can require Us to amend or change incorrect or incomplete data.
* You can require Us to delete or stop processing your data, where the data is no longer necessary for the purposes of the processing.
* You can object to the processing of your data where We are relying on its legitimate interests as the legal ground for the processing.
* You can ask Us to stop processing data for a period if the data is inaccurate or there is a dispute about whether or not your interests override the company's legitimate grounds for processing data.

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Notice, please contact Us using the details set out in the Section “How to Contact Us”.

**13. How to Contact Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at: admin@pathwayconsultancy.org with the subject line Data Protection

Please ensure that your query is clear, particularly if it is a request for information about the data, We hold about you.

**14. How to complain**

If you are unhappy with the way that We have processed or handled your data, please contact Us (see Section 13 How to Contact Us).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint to the Information Commissioner’s Office (ICO).

The contact details for the Information Commissioner’s Office are:

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113 Website: <https://ico.org.uk/concerns/>

**15. Changes to Our Privacy Notice**

We may change this Privacy Notice as We may deem necessary from time to time, or as may be required by English law. Any changes will be immediately posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

Last updated August 2023