

dialogue privacy notice

Your privacy matters to us

At dialogue Consultants Limited (trading as dialogue), we take your privacy seriously. We are a private limited company registered in England & Wales, with our registered office at Chimmels, Dartington Hall, Totnes, Devon, TQ9 6EQ. Our Information Commissioner's Office (ICO) registration number is ZA298077.

We support individuals and organisations meet their responsibilities in safeguarding children and young people. In doing so, we collect and process personal data. This privacy notice explains how we collect, use, store and share your information and your rights under the UK General Data Protection Regulation (UK GDPR).

Our role in handling data

In most situations, we act as a data controller, meaning we determine the purpose and means of processing your personal data, such as when you contact us, use our services, or work with us.

We also act as a data processor when handling personal data on behalf of our customers. In those cases, we only process information in accordance with the customer's instructions and under a contract.

Our privacy promise to you

Transparency

We are committed to openness. We will always inform you of what personal data we collect, why we collect it, how we use it, and with whom we may share it. We only collect what we need and do not retain it longer than necessary. Your data will never be sold and will only be shared with third parties where you have consented, where we are required by law, or where we work with trusted partners who help us deliver our services.

Security

We follow robust technical and organisational measures to protect your data from unauthorised access, loss or misuse. This includes encrypted storage, limited access, regular staff training, and strict contractual controls when using data processors (suppliers).

Control

You have full control over how we communicate with you. You can opt out of marketing or service-related emails at any time by contacting us at admin@dialogueltd.co.uk.



When and how we collect personal data

We collect personal data from you when you:

- Enquire about our services via email, phone, social media or our website
- Book meetings (including via Calendly)
- Attend training or events
- Purchase consultancy services
- Provide us with feedback
- Work with us as a contractor, partner or employee
- Apply for a job with us
- Sign up to receive communications

We may also collect data from third parties, including:

- Referrals from colleagues or other clients
- Public websites or directories (e.g. LinkedIn)
- Recruitment agencies
- Referees (for employment or service contracts)

What data we collect and why

Enquiries

When you enquire about our services, we collect your name, contact details and message. This enables us to respond and keep a record of our communications.

Consultancy customers

We collect contact and service details to manage our contracts, provide services, and meet accounting and legal obligations.

Membership and training

We collect names and contact details to administer memberships or event registrations. We may use this to inform you of future events. You can opt out at any time.

Website users

Cookies on our site help us understand how it is used and improve navigation. Cookies are small text files placed on the devices of visitors to websites. You can manage cookies by visiting your browser settings.



Subscribers

If you subscribe to our marketing emails, we will send you updates about our services or offers. You can unsubscribe anytime by emailing us at admin@dialogueltd.co.uk

Customer leads

We collect professional contact details from public sources to promote our services to employees of potential customers. Contact leads can opt-out at any time by emailing us at admin@dialogueltd.co.uk.

Job Applicants

We collect CVs, application forms and references. Where an applicant applies to a role through LinkedIn we may also view their LinkedIn profile. This information is used to assess the applicant's suitability and manage the recruitment process.

Employees, contractors and independent people

We process personal data about employees, contractors and independent people for employment, contractual and legal purposes. This includes:

- Contact and identification details: Name, address, date of birth, emergency contacts.
- *Employment information:* Contracts, roles, working hours, appraisals, training, disciplinary and exit records.
- *Payroll and financial data:* Bank details, National Insurance numbers, salary, pension, expenses.
- Background checks: Right to work and Disclosure and Barring Service (DBS) checks.
- System and IT use: Access logs and device usage for security and auditing.

We may also process special category data, such as:

- *Health information:* For absence management, workplace adjustments, and legal compliance.
- *Equality and diversity data:* Where provided voluntarily.

Processing is carried out to meet contractual obligations, comply with employment, health and safety, and equality laws and for legitimate business interests. Special category data is processed where necessary for employment law obligations or health and safety purposes.



Children

We do not actively collect children's data, but may receive it indirectly via feedback or other means. If details of a safeguarding incident are disclosed, we forward it to the relevant safeguarding lead. We delete any personal data relating to children as soon as possible, unless there is a legal obligation to retain it.

Who we share information with

We only share your personal data when necessary, and we will never use it in unexpected ways.

We may share your data:

- With your consent
- With trusted service providers (our "data processors") who help us deliver our services, such as cloud storage or payment platforms. They only process your data under our instructions and must meet strict security and legal standards.
- When required by law, for example, to comply with a court order or support safeguarding concerns.
- To protect vital interests, such as preventing serious harm to you or others.
- In connection with a business transfer, if we sell our company or its assets.
- To prevent fraud or protect rights to safeguard our company, customers, and others.

For more details on where your data is stored and who our service providers are, see Where We Store Your Data, below

Where we store your data

We store your personal data in the UK or European Economic Area (EEA). If any of our trusted service providers store data outside these regions, we put UK-approved international data transfer agreements in place to make sure your information is handled securely and in line with UK data protection laws.

We work with the following service providers on a regular basis:

- Microsoft 365 Email and productivity software
- Amazon Web Services (AWS) Data hosting
- <u>Salesforce</u> Customer Relationship Management



Our lawful basis for processing your data and how long we keep it for

When we collect, use and retain personal data, the data protection laws require us to have a valid lawful basis for doing so. These are set out in Article 6 of the UK GDPR and relate to consent; contracts; legal obligations; vital interests; public tasks and legitimate interests. When we process more sensitive information (Special Category Data) such as health information, we are required to have an additional lawful basis to handle that information. These are set out in Article 9 of the UK GDPR.

The table below outlines which lawful bases we rely on when we process your personal data and Special Category Data (eg health data), and how long we keep your information for:

Categories of data	Lawful bases	Retention period
General enquiries Name, email address, telephone number and nature of the enquiry	Legitimate Interests (Article 6(1)(f))	 1 year for enquiries made that do not lead to a contractual relationship. Where an enquiry leads to a contractual relationship, the enquiry information will form part of your customer file and will be held for 7 years after the end date of the contract.
Customers (consultancy customers, members of our memberships and training delegates) Name, email address, details of services, feedback	Contract (Article 6(1)(b)) Legitimate Interests (Article 6(1)(f))	7 years after the contract ends
Subscribers Name and email address	Consent (Article 6(1)(a)) Legitimate Interests (Article 6(1)(f))	We keep subscriber data until you unsubscribe; if the email address becomes invalid, or if we believe you no longer want to hear from us. We retain the contact details of those who have unsubscribed



		indefinitely, so we know not to contact them again.
Customer Leads Name, employer name, email address, telephone number	Legitimate Interests (Article 6(1)(f))	5 years for customer leads that do not lead to a contractual relationship. If the customer lead becomes a customer, the personal data is held in line with the customer retention period above.
Using our website Information including referral source, part of the webpage clicked, number of web pages visited and the length of time spent on each page. Please see our Cookie Policy for full details on how we use cookies and tracking technologies.	Legitimate Interests (Article 6(1)(f))	Please see our Cookie Policy for specific retention periods.
Job applicants Name, contact details, CV information	Contract (Article 6(1)(b)) Consent (Article 6(1)(a)) Legitimate Interests (Article 6(1)(f))	6 months after the application process has ended unless the applicant becomes an employee or gives us their permission to retain this information for longer.
Employees Name, contact details, pay & pension information, performance-related information, absence and health information	Contract (Article 6(1)(b)) Legal Obligation (Article 6(1)(c)) Article 9 Condition: Legal Obligation	7 years after the employment contract ends unless there is a legal reason or justification to retain this for longer.
Contractors & Independent People Name, contact details, pay & pension information,	Contract (Article 6(1)(b)) Legal Obligation (Article 6(1)(c)) Legitimate Interests	7 years after the contract ends unless there is a legal reason to retain this for longer.



performance-related information	(Article 6(1)(f))	
	Legal Obligation (Article 6(1)(c))	We do not actively collect children's data. Should a child disclose information about themselves via one of our anonymous feedback forms, we will immediately delete the data unless there is a legal reason for us to retain it. As soon as there is no longer a legal reason for us to retain the children's data, it will be immediately deleted.

How we protect your data

We take data security seriously and have implemented robust measures to protect personal data from accidental or unlawful access, disclosure, loss, damage, or destruction. These include:

- Storing data on encrypted UK-based servers; where data is stored outside the UK/EEA, International Data Transfer Agreements ensure compliance with UK GDPR.
- Restricting system access to authorised personnel on a need-to-know basis, with all staff and contractors bound by confidentiality obligations.
- Providing mandatory data protection training and requiring staff to adhere to our Data Protection Policy.
- Maintaining clear procedures for managing and reporting data security breaches.
- Conducting due diligence and using Data Processing Agreements with third-party processors to ensure legal compliance.
- Using up-to-date antivirus and encryption tools, with regular data backups.
- Applying appropriate safeguards when sharing data with trusted third parties.



Your data protection rights

You have the following rights under the data protection laws:

Right to know

You have the right to be told how your personal data is being processed. This privacy notice tells you how we handle your personal data.

Right of access

You have the right to ask us for a copy of your personal data.

Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Right to erasure

You have the right to ask us to erase your personal data in certain circumstances.

Right to restriction of processing

You have the right to ask us to restrict the processing of your personal data in certain circumstances.

Right to object to processing

You have the right to object to us using your personal data for direct marketing purposes.

Right to data portability

You have the right to ask that your personal data is transferred (ported) from us to another organisation or given to you. This applies to information you have given to us where we are processing your information based on your consent or for contractual purposes and the processing is automated.

Right to complain

We work to high standards when it comes to processing your personal data. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office.

To exercise your rights, contact us at admin@dialogueltd.co.uk. You are not usually required to pay a fee and can expect to receive a response within one calendar month.



Contact Us

If you have any questions about this notice or how your data is handled, please contact our Data Protection Lead at: admin@dialogueltd.co.uk

Updates to this notice

We may update this privacy notice from time to time. The latest version will always be available on our website. Last updated: July 2025