

THE PEOPLE MENTOR

Data Protection and Privacy Policy

Last updated: May 2026

ICO Registration Number: ZA877307

1. Introduction

The People Mentor is committed to protecting your personal data and handling it responsibly. This Data Protection and Privacy Policy explains what personal data we collect, why we collect it, how we use and protect it, and what your rights are in relation to it.

Please read this policy carefully. It applies to all clients, learners, website visitors, and anyone else whose personal data we hold. It should be read alongside any other privacy notices we may provide at the point of collecting your data.

2. Important Information and Who We Are

Who we are

The People Mentor is a leadership development and people management consultancy run by Nicola Richardson. We are a sole trader operating in the United Kingdom.

Data Controller

Nicola Richardson trading as The People Mentor is the data controller responsible for your personal data.

Nicola Richardson

The People Mentor

43 Prince William Drive, Butterwick, Boston, PE22 0JG

Email: hello@thepeoplementor.co.uk

Website: www.thepeoplementor.co.uk

ICO Registration

The People Mentor is registered with the UK Information Commissioner's Office (ICO). Our registration reference is ZA877307, registered on 10 March 2021 and valid until 09 March 2027.

Changes to this policy

We review this policy at least annually and may update it from time to time. The current version will always be published on our website. We will notify you of any significant changes by email where we hold your contact details.

It is important that the personal data we hold about you is accurate and up to date. Please let us know if your information changes at any point during your relationship with us.

Third-party links

Our website may contain links to third-party websites. Clicking those links may allow third parties to collect or share data about you. We do not control those websites and are not responsible for their privacy practices. We encourage you to read the privacy policy of every website you visit.

3. The Data We Collect About You

Personal data means any information that can identify a living individual. It does not include anonymised data. We may collect, use, store, and transfer the following categories of personal data about you:

- Identity data: first name, last name, job title, and organisation name.
- Contact data: email address, telephone number, and postal address where provided.
- Financial data: payment card details processed securely via our payment providers. We do not store card details ourselves.
- Transaction data: details of products and services you have purchased from us, including payment history.
- Programme data: information about your participation in our training programmes, coaching sessions, or membership, including progress, attendance, and CPD certificates issued.
- Marketing and communications data: your preferences regarding receiving marketing from us and your communication preferences.
- Technical data: Internet Protocol (IP) address, browser type and version, time zone, browser plug-in types, operating system, and other technology used to access our website.
- Usage data: information about how you use our website, programmes, and membership platform.

We do not intentionally collect any special category data (which includes information about race or ethnicity, religious or philosophical beliefs, health, biometric data, or sexual orientation). If you share any such information with us voluntarily during coaching or training sessions, we will treat it with the highest level of confidentiality.

If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract with you, and you fail to provide that data when requested, we may be unable to deliver the services you have purchased. We will notify you if this is the case.

4. How We Collect Your Personal Data

We collect personal data through the following methods:

- Direct interactions: when you purchase a programme, book a session, enrol in a membership, complete a form, contact us by email, or communicate with us by telephone or social media.
- Automated technologies: when you visit our website, we may automatically collect technical and usage data via cookies and similar technologies. Please see section 8 for more information on cookies.
- Third parties: we may receive data from payment processors (Stripe, PayPal), our membership platform (Heartbeat), and our email marketing and Course platform (Systeme.io) in the course of delivering our services.

5. How We Use Your Personal Data

We will only use your personal data where we have a lawful basis to do so. Most commonly, we use your data where:

- We need to perform the contract we have entered into with you.
- We need to comply with a legal or regulatory obligation.
- It is necessary for our legitimate interests, and your interests and rights do not override those interests.
- You have given us your consent (for example, to receive marketing emails).

The table below sets out the purposes for which we use your personal data, the types of data involved, and the lawful basis we rely on for each purpose.

Purpose / Activity	Type of Data	Lawful Basis	Retention Period
Register you as a client or learner	Identity, Contact	Performance of contract	6 years after last transaction
Process and manage programme enrolment and payments	Identity, Contact, Financial, Transaction	Performance of contract; Legal obligation	7 years (HMRC requirement)
Deliver CPD-accredited programmes and membership content	Identity, Contact, Usage, Programme	Performance of contract	Duration of programme plus 2 years
Issue CPD certificates and maintain learning records	Identity, Contact, Programme	Legal obligation; Legitimate interests	6 years from the date of issue
Send service-related communications (booking confirmations, session reminders)	Identity, Contact	Performance of contract	Duration of programme plus 1 year
Send marketing and newsletter communications	Identity, Contact, Marketing preferences	Consent	Until consent is withdrawn

Manage complaints and enquiries	Identity, Contact, Communications	Legal obligation; Legitimate interests	6 years from resolution
Improve our programmes through evaluation and feedback	Usage, Technical, Feedback (anonymised where possible)	Legitimate interests	3 years
Comply with legal and regulatory obligations	All relevant categories	Legal obligation	As required by law

Marketing

We may send you information about our programmes, resources, and services where you have opted in to receive marketing communications from us. We use Systeme.io to manage our email list and send marketing emails.

Promotional offers from us

We may use your identity, contact, and marketing preference data to send you promotional offers and information about our programmes. You will only receive these communications if you have provided your consent.

Opting out

You can ask us to stop sending you marketing communications at any time by clicking the unsubscribe link in any marketing email we send, or by contacting us directly at hello@thepeoplementor.co.uk. Opting out of marketing will not affect the service-related communications we need to send in connection with your programme or membership.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will notify you and explain the legal basis on which we do so.

6. Disclosures of Your Personal Data

We may share your personal data with the following third parties for the purposes described in this policy:

- Systeme.io: our email marketing and funnel platform, used to manage our mailing list and deliver email communications.
- Stripe and PayPal: our payment processors, used to process payments for programmes, memberships, and other purchases securely.
- Heartbeat: our membership platform, used to host and deliver The Manager's Academy and other member content.

- Zoom and Microsoft Teams: our video conferencing tools, used to deliver live coaching, training sessions, and virtual workshops.
- The CPD Standards Office: where required for CPD accreditation purposes, including the verification of accredited programme records.
- Professional advisers: including accountants, lawyers, and other professional advisers where necessary.
- HM Revenue and Customs and other regulatory authorities: where required by law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and they are permitted to process it only for specified purposes and in accordance with our instructions.

7. International Transfers

Some of our third-party service providers are based outside the United Kingdom. Specifically, Systeme.io, Stripe, PayPal, Heartbeat, and Zoom may process your personal data outside the UK and the European Economic Area (EEA).

Where we transfer your data outside the UK, we ensure that appropriate safeguards are in place to protect it. These safeguards may include:

- Transfer to countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- Use of UK International Data Transfer Agreements or Standard Contractual Clauses approved by the ICO.
- Use of providers' binding corporate rules or other approved transfer mechanisms.

You can request more information about the specific transfer safeguards we rely on by contacting us at hello@thepeplementor.co.uk.

8. Cookies

Our website uses cookies to distinguish you from other users and to improve your experience. A cookie is a small text file placed on your device when you visit a website.

We use the following types of cookies:

- Strictly necessary cookies: essential for the website to function and cannot be switched off.
- Analytical or performance cookies: allow us to count visits and understand how visitors move around our website so we can improve it.
- Functionality cookies: used to recognise you when you return to our website and to personalise content.
- Marketing cookies: used to track visitors across websites to display relevant advertising.

When you first visit our website, a cookie consent banner will ask for your permission before any non-essential cookies are placed on your device. You can change your cookie preferences at any time. Please note that disabling certain cookies may affect your experience of our website.

9. Data Security

We have put in place appropriate technical and organisational measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

These measures include:

- Use of password protection and access controls on all devices and accounts holding personal data.
- Use of reputable, GDPR-compliant third-party platforms for email, payment processing, and membership delivery.
- Payment data is processed exclusively through our payment providers (Stripe and PayPal). We never store payment card details ourselves.
- Encrypted communication channels where applicable.

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the ICO as required by law.

10. Data Retention

How long will we use your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting, or reporting requirements. The retention periods applicable to each category of use are set out in the purposes table in section 5.

In determining the appropriate retention period, we consider the amount, nature, and sensitivity of the data; the potential risk of harm from unauthorised use or disclosure; the purposes for which we process it; and the relevant legal requirements.

When we no longer need your personal data, we will securely delete or anonymise it.

11. Your Legal Rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights in relation to your personal data:

- The right to access: you have the right to request a copy of the personal data we hold about you.
- The right to rectification: you have the right to ask us to correct personal data that is inaccurate or incomplete.
- The right to erasure: you have the right to ask us to delete your personal data in certain circumstances, for example where it is no longer necessary for the purpose for which it was collected.
- The right to restrict processing: you have the right to ask us to restrict the processing of your personal data in certain circumstances.
- The right to data portability: you have the right to request that we transfer your personal data to you or a third party in a structured, commonly used, machine-readable format.
- The right to object: you have the right to object to the processing of your personal data where we rely on legitimate interests as the lawful basis, and where processing is for direct marketing purposes.
- Rights in relation to automated decision-making: you have the right not to be subject to a decision made solely by automated means that produces a legal or similarly significant effect on you. We do not currently use automated decision-making in our business.
- The right to withdraw consent: where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.

No fee is usually required

You will not usually have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive, or we may refuse to comply in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Time limit to respond

We aim to respond to all legitimate requests within one month. Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

How to exercise your rights

To exercise any of your rights, or if you have any questions about this policy or about the way we handle your personal data, please contact us at:

Nicola Richardson

The People Mentor

Email: hello@thepeoplementor.co.uk

Right to complain

If you are unhappy with the way we have handled your personal data, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

ICO

Website: www.ico.org.uk

Telephone: 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We would, however, appreciate the opportunity to address your concerns before you contact the ICO, so please do get in touch with us in the first instance.

12. Third Parties

External third parties

The third parties we use to deliver our services and who may process your personal data are:

- Systeme.io – email marketing and automation platform. Privacy policy available at systeme.io/privacy-policy.
- Stripe – payment processing. Privacy policy available at stripe.com/gb/privacy.
- PayPal – payment processing. Privacy policy available at paypal.com/uk/legalhub/privacy-full.
- Heartbeat – membership platform. Privacy policy available at heartbeat.chat/privacy.
- Zoom – video conferencing. Privacy policy available at explore.zoom.us/en/privacy.
- Microsoft Teams – video conferencing. Privacy policy available at privacy.microsoft.com.

13. Glossary and Lawful Basis

Lawful basis for processing

The lawful bases on which we rely to process your personal data are defined as follows:

- Consent: You have given clear consent for us to process your personal data for a specific purpose.
- Performance of contract: processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- Legal obligation: processing is necessary for us to comply with the law.
- Legitimate interests: processing is necessary for our legitimate interests or the legitimate interests of a third party, unless those interests are overridden by your rights and interests.

Key terms

Comply with a legal obligation: processing your personal data where it is necessary to comply with a legal obligation to which we are subject.

Legitimate interest: the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you before we process your data for our legitimate interests.

Performance of contract: processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

This policy was last reviewed in May 2026. It reflects the requirements of the UK GDPR and the Data Protection Act 2018. ICO Registration: ZA877307. The current version will always be published on our website.