GDPR & Data Protection Policy

Ever-So-Lean Limited
Document Owner: Ever-So-Lean
Policy Version: 1.1
Effective Date: 20 May 2026
Review Date: 20 May 2027

---

1. Purpose

Ever-So-Lean is committed to protecting the privacy, confidentiality, and integrity of personal data. We recognise the importance of handling information responsibly and in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other applicable data protection legislation.

This policy outlines how Ever-So-Lean collects, stores, processes, protects, and disposes of personal data in a lawful, fair, and transparent manner.

---

2. Scope

This policy applies to:

- All employees, associates, contractors, consultants, and third parties working on behalf of Ever-So-Lean
- All personal data processed by Ever-So-Lean in relation to clients, delegates, learners, suppliers, website users, business contacts, and employees
- All systems, devices, platforms, software, and records used to store or process personal information

This includes both digital and physical records.

---

3. Our Commitment

Ever-So-Lean is committed to:

- Respecting the privacy rights of individuals
- Processing personal data lawfully, fairly, and transparently
- Collecting only the data necessary for legitimate business purposes
- Keeping data accurate and up to date
- Protecting data against unauthorised access, loss, misuse, or disclosure
- Retaining data only for as long as necessary
- Supporting individuals in exercising their data protection rights
- Embedding data protection into our day to day operations and decision making

---

4. Data Protection Principles

Ever-So-Lean processes personal data in line with the following UK GDPR principles:

Personal data shall be:

Lawful, fair, and transparent

Data will only be collected and processed where there is a lawful basis for doing so.

Collected for specified purposes

Information will only be used for clear, legitimate business purposes.

Adequate, relevant, and limited

Only the minimum amount of personal data necessary will be collected.

Accurate and kept up to date

Reasonable steps will be taken to ensure data remains accurate.

Stored only as long as necessary

Personal data will not be retained longer than required.

Secure

Appropriate technical and organisational measures will be implemented to protect personal data.

Accountable

Ever-So-Lean accepts responsibility for complying with data protection legislation and demonstrating compliance where required.

---

5. Lawful Bases for Processing

Ever-So-Lean may process personal data under one or more of the following lawful bases:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interests
- Vital interests
- Public task where applicable

The lawful basis used will depend on the nature of the processing activity.

---

6. Types of Data We May Collect

Ever-So-Lean may collect and process:

- Names
- Job titles
- Company details
- Contact information
- Email addresses

- Telephone numbers
- Billing and payment information
- Learning and assessment records
- Training attendance and certification information
- Website usage data
- Marketing preferences
- Correspondence and communication records

Special category data will only be processed where strictly necessary and where a lawful condition for processing has been met.

---

7. How We Collect Data

Personal data may be collected through:

- Website contact forms
- Course registrations
- Event bookings
- Consultancy engagements
- Client contracts
- Delegate enrolment and attendance records
- Email correspondence
- Social media interactions
- Surveys and feedback forms
- Learning management systems
- Third party business platforms and providers

---

8. Use of Personal Data

Ever-So-Lean may use personal data for purposes including:

- Delivering training and consultancy services
- Managing client relationships and contractual agreements

- Managing delegate and learner registrations, attendance, assessments, and certifications
- Communicating with clients, delegates, and learners
- Providing customer support
- Managing contracts and invoicing
- Improving services and user experience
- Meeting legal and regulatory obligations
- Sending relevant business updates or marketing communications where lawful to do so

We do not sell personal data to third parties.

---

9. Data Sharing

Personal data may be shared with trusted third parties where necessary to support business operations, including:

- Accreditation bodies
- Learning management system providers
- Payment processors
- IT and cloud service providers
- Professional advisers
- Regulatory authorities where legally required

All third parties are expected to process personal data securely and in accordance with applicable data protection laws.

---

10. International Data Transfers

Where personal data is transferred outside the United Kingdom, Ever-So-Lean will ensure appropriate safeguards are in place, including the use of recognised adequacy regulations or approved contractual safeguards.

---

11. Data Security

Ever-So-Lean implements appropriate technical and organisational security measures to protect personal data, including:

- Secure password management
- Access controls and permissions
- Encrypted systems where appropriate
- Secure cloud storage
- Anti malware and cybersecurity measures
- Staff awareness and training
- Regular system and software updates

Despite these measures, no method of transmission or storage is completely secure. We continuously review and improve our security arrangements.

---

12. Data Retention

Personal data will only be retained for as long as necessary to fulfil the purpose for which it was collected, including legal, contractual, financial, accreditation, and operational requirements.

Retention periods may vary depending on the nature of the information and applicable obligations.

---

13. Individual Rights

Under UK GDPR, individuals may have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure of personal data
- Restrict processing
- Object to processing
- Request transfer of their data

- Withdraw consent where processing relies on consent
- Lodge a complaint with the Information Commissioner's Office (ICO)

Requests relating to personal data should be submitted using the contact details below.

---

14. Data Breaches

Any actual or suspected personal data breach will be investigated promptly.

Where required, Ever-So-Lean will notify the Information Commissioner's Office and affected individuals in accordance with legal obligations.

---

15. Responsibilities

Everyone working for or on behalf of Ever-So-Lean has a responsibility to:

- Handle personal data responsibly
- Follow this policy and associated procedures
- Maintain confidentiality
- Report suspected breaches or concerns immediately

Failure to comply with this policy may result in disciplinary or contractual action.

---

16. Cookies & Website Data

The Ever-So-Lean website may use cookies and analytics tools to improve functionality, understand website usage, and enhance user experience.

Users will be provided with appropriate cookie controls and information in line with applicable regulations.

---

17. Contact Details

For questions, concerns, or requests relating to this policy or personal data, please contact:

Ever-So-Lean
The Old Cinema
Fishmarket Road
Rye
East Sussex
TN31 7LP
United Kingdom

Email: support@eversolean.com
Website: https://www.eversolean.com

You also have the right to contact the UK Information Commissioner's Office:

https://ico.org.uk

---

18. Policy Review

This policy will be reviewed regularly and updated where necessary to reflect changes in legislation, guidance, or business operations.

Approved by: Matt Sims | Managing Director | Ever-So-Lean
Version: 1.1
Date: 20 May 2026