COGNISENSE CONSULTING

# Privacy Notice

How we collect, use and protect personal information

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|---|---|
| **Data controller** | Cognisense Consulting Limited ("Cognisense", "we", "us", "our") |
| **Company number** | 09767945 (registered in England and Wales) |
| **Registered office** | Brooklands, Gores Lane, Crank, Merseyside, WA11 8QX |
| **ICO registration number** | 00016358620 |
| **Privacy contact** | Sonia Rignall |
| **Last updated** | 11/10/2025 — Version 1.1 |

## At a glance

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|---|---|
| **Who we are** | An occupational psychology and talent consultancy providing coaching, psychometric assessment, organisation development and facilitation. |
| **What we collect** | Contact and role details; coaching notes; assessment results; workshop information; invoicing details. |
| **Why** | To deliver the services you or your organisation have asked for, to run our business, and to meet our legal and professional obligations. |
| **Who sees it** | Only those who need to: your coach or consultant, test publishers' platforms, carefully chosen service providers, and your sponsoring organisation (but only what has been agreed with you). |
| **We never** | Sell your data, or share coaching conversations with your employer without your consent. |
| **Your rights** | To see, correct, delete or limit the use of your data, to object, and to complain to us or to the ICO. |

## 1. Who we are

Cognisense Consulting Limited is the **data controller** for the personal data described in this notice. This means we decide how and why it is used, and we are responsible for looking after it in line with UK data protection law. This includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

We are registered with the Information Commissioner's Office (ICO) under registration number . We are not required to appoint a Data Protection Officer. Sonia Rignall, Director and Founder, is responsible for data protection and can be contacted at sonia@cognisenseconsulting.co.uk or Brooklands, Gores Lane, Crank, Merseyside, WA11 8QX.

## 2. Who this notice applies to

This notice applies to you if you are:

(a) a **coachee**, whether you fund your own coaching or your organisation sponsors it;

(b) an **assessment participant**, for example someone completing a psychometric assessment as part of a development programme or selection process;

(c) a **participant** in a workshop, team session, leadership programme or organisational development project we deliver;

(d) a **client contact**, meaning someone we deal with at an organisation that engages us;

(e) someone who **enquires** about our services or visits our website; or

(f) an **associate or supplier** who works with us.

## 3. The information we collect

| Type of information | Examples |
|---|---|
| Identity and contact | Name, job title, organisation, email address, telephone number, postal address. |
| Professional background | Role, responsibilities, line manager, career history, development goals. |
| Coaching information | Session notes, agreed objectives, actions and reflections, and any summaries agreed with you. |
| Psychometric assessment data | Your responses, scores and reports from instruments such as Hogan Development Suite, OPQ, JTI, Thomas Kilmann, and notes from feedback sessions. |
| Programme and workshop information | Attendance, materials you produce, feedback forms, and 360 degree feedback, where part of the programme. |
| Financial information | Invoices, payment records and purchase order details. We do not store card details. |
| Communications | Emails, messages and records of calls with us. |
| Website information | Only self completion of enquiry form or booking information for a 1-1 appointment. |

### Sensitive information

Some information is given extra protection by law ("special category data"). This includes information about health, including mental health, as well as ethnicity, religion, sexual orientation and similar matters. We do not ask for this information. However, it may come up naturally in coaching, for example if you talk about wellbeing or personal circumstances.

We will record sensitive information only where it is relevant to your coaching, and only with your explicit consent, which you can withdraw at any time. Where we need to record it, we will keep the record to a minimum.

## 4. Where we get your information

Most information comes **directly from you**, through conversations, emails, forms, coaching sessions and the assessments you complete.

We may also receive information from:

(a) **your employer or sponsoring organisation:** for example your name, role, contact details and the objectives of a coaching or development programme;

(b) **psychometric publishers' online platforms:** the scores and reports generated when you complete an assessment;

(c) **colleagues who give feedback about you:** where a 360-degree or similar feedback process forms part of a programme you have been told about; and

(d) **publicly available sources:** for example professional profiles such as LinkedIn, used for business contacts only.

## 5. How we use your information and our lawful basis

The law requires us to have a valid reason, called a "lawful basis", for each way we use personal data. The table below sets out what we do and why.

| What we use it for | Lawful basis |
|---|---|
| Delivering coaching that you have bought for yourself | Contract: we need it to provide the service you have asked for. |
| Delivering coaching, assessment, facilitation or consulting that your organisation has engaged us to provide | Legitimate interests: delivering the services our client has commissioned, and supporting your development (see below). |
| Administering psychometric assessments and giving you feedback | Legitimate interests, or Contract where you have engaged us directly. |
| Keeping notes that include sensitive information you choose to share in coaching | Explicit consent. |
| Discussing anonymised material in professional supervision | Legitimate interests: maintaining professional standards. You will not be identifiable. |
| Invoicing, payments and keeping accounts | Contract and Legal obligation (tax and company law). |
| Responding to enquiries and managing client relationships | Legitimate interests: running and developing our business. |
| Sending occasional updates about our services to business contacts | Legitimate interests. You can opt out at any time. Where the law requires it, for example for sole traders, we will ask for your consent first. |
| Disclosing information where there is a serious risk of harm to you or others, or where the law requires it | Vital interests, Legal obligation or Substantial public interest (safeguarding). |
| Handling complaints and establishing or defending legal claims | Legitimate interests and Legal obligation. |

**About legitimate interests:** where we rely on legitimate interests, we have balanced our interests against your rights and expectations. We use your data only in ways you would reasonably expect. You have the right to object (see section 11).

### Automated decision-making

Psychometric reports are generated by computer scoring. However, we never make decisions about you based solely on automated processing. Every report is interpreted by a qualified practitioner, and we advise clients that assessment results should not be the only basis for decisions about people.

## 6. What your sponsoring organisation will see

If your employer or another organisation sponsors your coaching or assessment, we will agree with you, before you start, exactly what is shared with them. This is recorded in your Coaching Agreement or in the programme briefing. Typically this is limited to attendance, agreed objectives and any summary you have approved.

**The content of coaching conversations is not shared with your sponsor.** Assessment reports are shared only where this has been agreed with you in advance. The only exceptions are the limited circumstances set out in section 5, such as a serious risk of harm.

## 7. Who we share your information with

We share personal data only where necessary, and only with people bound by confidentiality or by data protection contracts with us. **We never sell personal data.**

| Who | Why |
|---|---|
| Your sponsoring organisation | Only the information agreed with you (see section 6). |
| Psychometric publishers and distributors, e.g. APS Ltd as the Hogan provider and other psychometric providers with strict confidentiality and data handling policies. | To host the online assessment, score your responses and produce reports. |
| Associate coaches and consultants | Where they are delivering part of your programme on our behalf. |
| Professional supervisor | Anonymised discussion only, to maintain professional standards. |
| IT and service providers, e.g. Zoom, Micorsoft Teams, Google Workspace, WIX website hosting. | Email, secure storage, video calls, accounting and website hosting. |
| Our accountant, insurers and professional advisers | To run our business and meet legal requirements. |
| Regulators, professional bodies, courts or law enforcement | Only where we are legally required to, or to protect someone from serious harm. |

## 8. Transfers outside the UK

Some of our service providers, including psychometric providers or cloud services,, may store or process data outside the UK, for example in the European Economic Area or the United States.

Where this happens, we make sure appropriate safeguards are in place. These are either UK "adequacy regulations" (which confirm that a country, or a certified US organisation, protects data to a UK-equivalent standard) or approved contract terms, such as the ICO's International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses. You can contact us for more information about these safeguards.

## 9. How long we keep your information

We keep personal data only for as long as we need it. It is then securely deleted or destroyed.

| Information | How long we keep it |
|---|---|
| Coaching notes | 24 months after the end of your coaching programme. |
| Psychometric responses, scores and reports | 24 months after completion, unless you ask us to delete them sooner. |
| Workshop and programme records (attendance, feedback) | 2 years after the programme ends. |
| Contracts, invoices and financial records | 6 years after the end of the financial year they relate to (required for tax and company law). |
| Enquiries that do not lead to work | 12 months. |
| Business contacts on our mailing list | Until you unsubscribe, or after 2 years without contact. |
| Complaints and records relating to claims | 6 years after the matter is closed. |

We may keep information for longer where the law requires it, or where it is needed for an ongoing complaint or legal claim.

## 10. How we keep your information secure

We use appropriate technical and organisational measures to protect your information. These include encrypted devices, strong passwords and multi-factor authentication, secure cloud storage, access limited to those who need it, and locked storage for any paper records. Our service providers must protect data to the same standard.

If a data breach occurs that is likely to put your rights at risk, we will tell the ICO within 72 hours. Where the risk is high, we will also tell you.

## 11. Your rights

You have the following rights over your personal data:

(a) **Access:** to ask for a copy of the information we hold about you;

(b) **Correction:** to ask us to correct information that is inaccurate or incomplete;

(c) **Erasure:** to ask us to delete your information, where we no longer have a good reason to keep it;

(d) **Restriction:** to ask us to limit how we use your information, for example while a correction is checked;

(e) **Objection:** to object to our use of your information where we rely on legitimate interests, and at any time to direct marketing;

(f) **Portability:** to receive information you have given us in a commonly used electronic format, where we rely on consent or contract;

(g) **Withdrawing consent:** where we rely on your consent, to withdraw it at any time; and

(h) **Automated decisions:** not to be subject to decisions based solely on automated processing that significantly affect you.

To use any of these rights, contact Sonia Rignall at sonia@congisenseconsulting.co.uk.. You do not need to use any particular form of words. There is normally no charge. We will respond within one month, although this can be extended by up to two further months for complex requests. If so, we will tell you why. We may need to confirm your identity before responding.

You are entitled to see your own assessment results. However, test questions and scoring keys belong to the test publishers, are protected by copyright, and cannot be released.

## 12. How to complain

If you are unhappy with how we have handled your personal data, please tell us first so that we can put things right. You can complain to Sonia Rignall by email at sonia@congisenseconsulting.co.uk, by post to Cognisense Consulting, Brooklands, Gores Lane, Crank, WA11 8QX, or by telephone on 07899961933. You do not need to use a form or any particular wording.

We will acknowledge your complaint within 30 days. We will then investigate it promptly and let you know the outcome.

If you are not satisfied with our response, you have the right to complain to the **Information Commissioner's Office (ICO)**, the UK regulator for data protection:

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|---|---|
| **Website** | ico.org.uk/make-a-complaint |
| **Telephone** | 0303 123 1113 |
| **Post** | Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF |

## 13. Changes to this notice

We review this notice regularly and may update it from time to time. The latest version will always be available at https://www.cognisenseconsulting.com/ If we make significant changes that affect you, we will tell you. This notice was last updated on 11/10/2025.