

Gold Management Partners LLP (GMP LLP)

GDPR & Privacy Compliance Pack (UK / EU)

Registered Office: 71–75 Sheldon Street, London, WC2H 9JQ, United Kingdom
Business Type: Management Consultancy

1. GDPR & Data Protection Policy

(This section incorporates the previously provided GDPR & Data Protection Policy and should be read alongside the notices below.)

Gold Management Partners LLP (“GMP LLP”, “we”, “us”) is committed to protecting personal data in compliance with the UK General Data Protection Regulation (UK GDPR), EU General Data Protection Regulation (EU GDPR), and the UK Data Protection Act 2018.

GMP LLP acts primarily as a **Data Controller** and ensures that personal data is processed lawfully, fairly, transparently, securely, and for legitimate business purposes only.

Data Protection Lead: Stuart Neale

2. Privacy Notice (Clients, Prospects & Business Contacts)

2.1 Who We Are

Gold Management Partners LLP is responsible for your personal data.

Contact for Data Protection Matters:

Data Protection Lead: Stuart Neale

Email: info@goldpartners.co.uk

Address: 71–75 Sheldon Street, London, WC2H 9JQ, UK

2.2 What Data We Collect

- Name, job title, employer
- Business contact details (email, phone, address)
- Contractual and billing information
- Communications and correspondence
- Marketing preferences

2.3 How We Use Your Data

- To provide consultancy and advisory services
- To manage client relationships and contracts

- To issue invoices and manage payments
- To comply with legal and regulatory obligations
- To send business communications and marketing (where permitted)

2.4 Lawful Basis

- Contractual necessity
- Legitimate interests
- Legal obligations
- Consent (where required)

2.5 Data Retention

Data is retained only for as long as necessary, typically:

- Client records: 6–7 years after contract end
- Marketing records: until consent is withdrawn

2.6 Your Rights

You have rights of access, rectification, erasure, restriction, objection, portability, and to withdraw consent.

3. Cookie Policy

3.1 What Are Cookies

Cookies are small text files placed on your device to improve website functionality and user experience.

3.2 Types of Cookies Used

- **Strictly Necessary Cookies** – essential for website operation
- **Analytics Cookies** – help us understand website usage
- **Functional Cookies** – remember preferences

3.3 Managing Cookies

Users may manage cookie preferences through browser settings or via our cookie banner. Non-essential cookies are only used with consent.

4. Subject Access Request (SAR) Procedure

4.1 Making a Request

Requests can be made by email or post. Proof of identity may be required.

4.2 Response Timeline

- Responses provided within **1 month**
- Extensions (up to 2 months) may apply for complex requests

4.3 No Fee Policy

SARs are processed free of charge unless manifestly unfounded or excessive.

4.4 Request Log

All SARs are logged, tracked, and reviewed by the Data Protection Lead.

5. Data Processing Agreements (DPA) – Supplier Controls

5.1 When DPAs Are Required

DPAs are in place with all third parties who process personal data on behalf of GMP LLP.

5.2 Minimum DPA Clauses

- Processing only on documented instructions
 - Confidentiality obligations
 - Appropriate technical and organisational security measures
 - Sub-processor controls
 - Assistance with data subject rights and breach notifications
 - Secure deletion or return of data on contract termination
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6. Data Breach Management

6.1 Identification & Containment

All suspected breaches are reported immediately to management.

6.2 Notification

- ICO notified within 72 hours where required
- Affected individuals informed where there is high risk

6.3 Record Keeping

All breaches are documented regardless of notification requirement.

7. International Data Transfers

Where personal data is transferred outside the UK or EEA, GMP LLP relies on:

- UK / EU adequacy decisions
 - Standard Contractual Clauses (SCCs)
 - Additional safeguards where required
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8. Training & Accountability

All staff and contractors receive data protection awareness training. GMP LLP maintains Records of Processing Activities (RoPA) and conducts periodic compliance reviews.

9. Review & Updates

This compliance pack is reviewed annually or sooner if regulatory or operational changes occur.

Last Review Date: (Insert)

10. Complaints

If you are unhappy with how your data is handled, you may complain to:

- UK Information Commissioner's Office (ICO)
- Relevant EU Supervisory Authority (for EU residents)