

Privacy Policy

Jenny Garrett Global (Reflexion Associates Limited)

Last updated: December 2025

Who We Are

We're Jenny Garrett Global, a leadership development consultancy. Our registered company is Reflexion Associates Limited. We're committed to protecting your privacy and being transparent about how we use your data.

Our Data Protection Representative is Tania Christopher.

Email: Tania.Christopher@jennygarrett.global

Phone: +44 (0) 8447764744

We're registered with the Information Commissioner's Office (ICO). Registration number: ZA454896

What Data We Collect

We collect information you give us directly, such as:

- Name, email address, phone number and organisation when you contact us
- Email address when you subscribe to our newsletter
- Information about programme participants provided by client organisations
- Feedback and evaluation responses

We also collect some information automatically when you visit our website, including your IP address, browser type, and pages visited. We use cookies for this – see our section on cookies below.

How We Use Your Data

We use your information to:

- Respond to your enquiries
- Deliver coaching, training and leadership development programmes
- Send you our newsletter and updates (only if you've opted in)
- Improve our website and services
- Meet our legal and contractual obligations

Our Legal Basis for Processing

Under UK GDPR, we process your data based on:

- **Consent:** When you sign up for our newsletter or agree to us contacting you
- **Contract:** When we need your data to deliver services you or your organisation has engaged us for
- **Legitimate interests:** To improve our services and website, where this doesn't override your rights
- **Legal obligation:** Where we're required to keep records by law

Cookies

Our website uses cookies to help it work properly and to understand how visitors use it. When you first visit, you'll see a cookie banner asking for your consent.

We use:

- **Essential cookies:** Required for the website to function
- **Analytics cookies:** Help us understand how visitors use our site (e.g., Google Analytics)

You can change your cookie preferences at any time through your browser settings.

Who We Share Your Data With

We only share your data when necessary:

- With our email marketing provider (MailChimp) if you subscribe to our newsletter
- With associate facilitators delivering programmes on our behalf
- With your organisation if they've commissioned our services
- Where required by law

We never sell your data to third parties.

How Long We Keep Your Data

We keep your data only as long as we need it:

- Enquiries: 2 years unless you become a client
- Client and programme records: Duration of engagement plus 6 years
- Newsletter subscribers: Until you unsubscribe
- Financial records: 6 years (legal requirement)

Your Rights

You have the right to:

- Access your data and request a copy
- Correct any inaccuracies
- Request deletion of your data
- Object to or restrict how we use your data
- Withdraw consent at any time
- Lodge a complaint with the ICO (ico.org.uk)

To exercise any of these rights, contact us at the details above. We'll respond within one month.

International Transfers

We keep your data within the UK and EEA wherever possible. Where we use services that may process data outside this area (such as cloud providers), we ensure appropriate safeguards are in place.

Changes to This Policy

We may update this policy from time to time. Any significant changes will be posted on our website.

Signed: Jenny Garrett OBE

Date: December 2025

Next review: December 2026