



Privacy & Cookies Notice

Common Path Connection Ltd.

Introduction

This privacy notice explains how Common Path Connection Ltd. ("we", "us") collects and uses personal information through our website, consultancy services and professional conversations, and your rights under UK data protection law.

We are committed to handling your information fairly, lawfully, and transparently. We never sell personal data. You can withdraw cookie consent at any time via [Manage cookies](#); we will apply your choice going forward.

Controller & Contact

Company Name: Common Path Connection Ltd.

Address: Pixmore Centre, Unit 2.4, Pixmore Avenue, Letchworth Garden City, SG6 1JG

Company Number: 15030546

Email: Connect@CommonPathConnection.com

What Information We Collect and Why

1. To provide and improve consultancy services

- Names and contact details
- Addresses
- Occupation and employment details (role, length of service, performance information where relevant)
- Third-party information (such as colleagues mentioned in 360° feedback)
- Health and wellbeing information (where relevant in psychometric assessments or discussions)
- Psychometric responses and generated profiles/reports only with explicit consent
- Brief meeting and interview notes; audio or video recordings only with your consent
- Compliments and complaints information

Lawful bases: Contract where necessary to provide services under a contract with you; Legitimate Interests for administering and delivering services to client organisations and keeping proportionate working notes; Consent for psychometric assessments and recordings. Our legitimate interests are delivering effective consultancy services, maintaining appropriate records and improving our practice.



2. Operation of client accounts and administration

We collect names and contact details, addresses, purchase and service history, account registration and security details, technical data about browser, operating system and website usage, and records linked to client accounts.

Lawful bases: Contract where necessary to administer a contract with you; Legal Obligation for required records; Legitimate Interests for managing business relationships, scheduling, maintaining accounts and securing our systems.

3. Information updates and marketing

- Names and contact details
- Marketing preferences

We may send relevant marketing emails to corporate subscribers, such as limited companies, relying on legitimate interests where appropriate. Our interest is developing business relationships and promoting relevant services. For individual subscribers, including sole traders and certain partnerships, we obtain consent unless all conditions of a permitted soft opt-in are met. We identify ourselves and provide a simple way to opt out in every marketing message. Taking part in 'Lessons from organisational life' does not enrol you in marketing communications.

4. Research, supervision, and archiving

- Anonymised or pseudonymised notes, recordings, psychometric data
- Client/project history

We use relevant material to improve services, maintain professional standards and, where appropriate, support research. We minimise identifying information and use effectively anonymised material wherever possible. Replacing names with codes is pseudonymisation: that information remains personal data and continues to receive data protection safeguards.

Where personal data is needed, we identify the applicable lawful basis before use. This may be Legitimate Interests in improving professional practice and service quality, subject to necessity and a balancing assessment, or Consent where the use depends on your agreement. We explain any additional research purpose before using your information for it. Special category information also requires a separate condition, as explained below.

Research outputs use effectively anonymised or aggregated information so individuals cannot reasonably be identified. Separately approved quotations and accounts contributed through 'Lessons from organisational life' follow the publication arrangements in section 7.

5. Legal and regulatory compliance

- Names and contact details
- Financial/account information
- Any other information needed to meet legal obligations

Lawful basis: Legal Obligation



6. Queries, complaints, or claims

- Names and contact details
- Addresses
- Payment details
- Service history and correspondence
- Relevant project/assessment records

Lawful bases: Legitimate Interests in responding to enquiries, investigating concerns and establishing, exercising or defending legal claims; Legal Obligation where applicable.

7. Lessons from organisational life

Participation is voluntary. We collect your name, reflection, optional role or area of work, follow-up preference and any email address you provide. If we correspond or speak, we may keep relevant correspondence and brief notes. Please omit identifying details about other people, sensitive personal information and anything confidential to your organisation. We remove unnecessary sensitive or identifying details if they are submitted.

We use contributions to understand organisational experience, question assumptions and develop our professional practice. General learning may inform our writing once identifying details have been removed so that individuals and organisations cannot reasonably be recognised. We rely on Legitimate Interests in learning from professional experience and improving our services, balanced against your rights and reasonable expectations.

Only Andrew Pigott has access to contributions and associated contact details within Common Path Connection. Wix and Microsoft 365 process the information to provide our forms, email and storage services. We do not share contributions with your employer or client organisations. Any disclosure required by law will be limited to what is necessary.

If you choose a follow-up conversation, Andrew will email you about your contribution. You can contribute without agreeing to a conversation and can ask Andrew to stop follow-up contact at any time. Participation does not add you to a marketing list. Conversations are not recorded or automatically transcribed by default; any proposed recording or transcription will be explained and separately agreed in advance.

We seek your separate approval before publishing your words, a specific account of your experience, or information identifying you or your organisation. This includes specific accounts we propose to publish without names. We agree the wording, context and attribution with you first. Where publication contains your personal data, we rely on your consent. You may withdraw that consent at any time; we will stop further use and remove content from channels we control where applicable, but cannot guarantee retrieval of copies already distributed or republished by others.

The retention arrangements below apply to contributions, correspondence and notes. You may contact us to request deletion or object to our use of your personal data, subject to the applicable legal conditions. The other sections of this notice explain our service providers, international transfers, security and your rights.



Special category information

We may process special category data where necessary, including:

- Health information (e.g. wellbeing-related data in psychometrics, coaching, or notes)
- Psychometric outputs that reveal or infer health information or another special category of personal data

In addition to an Article 6 lawful basis, we identify an applicable Article 9 condition before processing special category information. This may be explicit consent or, where the statutory requirements apply, necessity for employment law obligations. We rely on Article 9(2)(j) only for qualifying scientific or historical research, statistical purposes or archiving in the public interest, where the applicable UK legal requirements, public-interest test and safeguards are met. Ordinary reflective practice does not automatically qualify.

Where we get personal information from

- Directly from you (enquiries, meetings, assessments, contributions and follow-up conversations)
- Client organisations (HR, managers providing employee details)
- Psychometric assessment providers (questionnaire results and reports)
- Professional associates/subcontractors (when jointly delivering services)
- Publicly available sources (e.g. LinkedIn, company websites)
- Suppliers and service providers (e.g. platforms you interact with directly such as Wix forms, Microsoft Teams)
- Microsoft Bookings – details you enter when booking a meeting.

How long we keep information

- Client project records (notes, reports, correspondence): Up to 6 years after the end of the final contract with a client, to allow for follow-up or legal claims.
- Audio/video recordings: Normally deleted within 12 months unless otherwise agreed.
- Psychometric responses/reports: Retained for the duration of the contract, then deleted or effectively anonymised unless a documented continuing need, such as a legal claim, justifies longer retention. Pseudonymised records remain personal data and are not kept indefinitely simply because names have been replaced.
- Financial/invoicing data: 6 years plus the current tax year (HMRC requirement).
- Lessons from organisational life: We review identifiable contributions, associated contact details, correspondence and notes 12 months after submission or the last related conversation, whichever is later. We delete or effectively anonymise them unless a documented continuing purpose justifies longer retention, for example an ongoing exchange or an approved publication. Any extension has a defined review date and lasts only as long as necessary. We retain a limited record of publication permissions while the approved material is in use and for any justified period needed to address a dispute.



- Marketing/contact lists: Kept while needed for relevant, lawful communications and reviewed periodically. If you opt out, we stop marketing and retain only the minimum suppression information needed to respect your preference.
- Effectively anonymised learning, research and supervision material: May be retained indefinitely where individuals cannot reasonably be identified. Anonymising information does not remove any separate obligation to protect confidential organisational information.

Who we share information with

Data processors (process data on our behalf):

- Website hosting/enquiry forms – Wix (IT services, Israel/US/EU)
- Cloud productivity/communication – Microsoft 365 (USA HQ, UK/EU data centres)
- Video conferencing – Microsoft Teams, Zoom (USA HQ, global servers)
- Psychometric assessment platforms (various, UK/EU/USA)
- Accounting software – QuickBooks (Intuit, USA HQ, UK/EU servers)
- Payment services – PayPal, Square (USA HQ, global servers)
- Survey/feedback platforms – SurveyMonkey (USA HQ), Qualtrics (USA HQ, EU centres)
- E-signature services – DocuSign, Adobe Sign, PandaDoc (USA HQ, global servers)
- Scheduling – Microsoft Bookings (Microsoft 365; UK/EU data centres, global infrastructure)
- Cloud storage/backup providers (USA HQ, UK/EU data centres)

Other third parties (independent controllers):

- Client organisations (reports or feedback provided to HR, managers or leadership under the agreed service arrangements; this does not include 'Lessons from organisational life' contributions)
- Barclays Bank (UK) for payment processing
- Professional advisors (accountants, solicitors, business advisors)
- Insurers (professional indemnity cover)
- Regulators (e.g. HMRC, ICO) where legally required

International transfers

Some of our service providers are based outside the UK/EEA (including the United States and Israel) or may store data in those regions. Where this occurs, we rely on:

- UK adequacy regulations (e.g. Israel, EU/EEA)
- Standard Contractual Clauses with UK Addendum, approved by the ICO

Where we use contractual safeguards, you can contact us to request information about them or a copy, with any necessary redactions. We assess the applicable transfer arrangements for the services we use.



Cookies and similar technologies (PECR)

We use essential cookies to make the site work (e.g., security, load-balancing, consent logging). These do not require consent.

We will only set optional cookies, including optional analytics or advertising cookies where used, if you choose to allow them. Our policy is to seek consent for these optional technologies rather than rely on legitimate interests to place them.

When you first visit, you can Accept all, Reject all, or choose Settings. If you take no action, we do not place non-essential cookies. You can change your choice any time via Manage cookies.

The Manage cookies panel shows each cookie provider, purpose and lifespan, and whether it is first-party or third-party.

If you follow a link to our Microsoft Bookings page (hosted by Microsoft), Microsoft may set essential cookies needed to provide the booking service.

Automated decision-making

We do not use personal data for automated decision-making that produces legal or similarly significant effects.

Security

We take appropriate technical and organisational measures to protect personal information, including secure storage, access controls, and confidentiality agreements with staff and associates.

Children's data

Our services are directed at adults. We do not knowingly collect information relating to children.

Your rights

Depending on the circumstances and lawful basis, you may have rights to access, rectify, erase or restrict use of your personal data, and to receive certain data in a portable format. You may object to processing based on legitimate interests, including our handling of voluntary contributions. You have an absolute right to object to direct marketing. Where we rely on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal. To make a request, contact connect@commonpathconnection.com. We normally respond within one month and will explain any lawful extension or exception. Once information has been effectively anonymised and can no longer be linked to you, we may be unable to identify or remove your contribution from that material.

You can also complain to the ICO if you are unhappy with how we use your data:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline: 0303 123 1113

[Make a complaint to the ICO](#)



Last updated

08 October 2026