



# Privacy & Cookies Notice

## Common Path Connection Ltd.

### Introduction

This privacy notice explains how Common Path Connection Ltd. (“we”, “us”) collects and uses personal information, and what rights you have 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: 60 Tottenham Court Road, Suite 3258a, Fitzrovia, London, W1T 2EW

Company Number: 15030546

Email: [Connect@CommonPathConnection.com](mailto: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
- Meeting/interview recordings and notes
- Compliments and complaints information

Lawful bases: Contract, Consent (for psychometrics/recordings), Legitimate Interests

#### 2. Operation of client accounts and administration

- Names and contact details
- Addresses
- Purchase/service history
- Account registration and security details



- Technical data (browser, operating system, website usage)
- Project records linked to client accounts

Lawful bases: Contract, Legal Obligation, Legitimate Interests

### 3. Information updates and marketing

- Names and contact details
- Marketing preferences

We may send occasional service updates to business contacts on legitimate interests. For personal email addresses, we only send marketing with your consent or where the soft opt-in applies. Every message includes an unsubscribe link and you can opt out at any time.

### 4. Research, supervision, and archiving

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

We use this material to improve services, maintain professional standards, and occasionally support publishable research. Identifiable information is minimised or removed wherever possible.

Lawful bases: Legitimate Interests, Consent (if identifiable data is retained). For special category data, we may also rely on Article 9(2)(j) UK GDPR – processing necessary for archiving and research purposes, with appropriate safeguards.

Any research outputs will use only anonymised or aggregated data, so individuals cannot be identified.

### 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, Legal Obligation



## 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 where relevant to agreed services

Lawful bases under Article 9 UK GDPR: Explicit Consent; in limited cases, necessary for employment law obligations; Article 9(2)(j) for research/archiving with safeguards.

## Where we get personal information from

- Directly from you (enquiries, meetings, assessments)
- 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; anonymised or pseudonymised data may be kept indefinitely for supervision, reflective practice, or research.
- Financial/invoicing data: 6 years plus the current tax year (HMRC requirement).
- Marketing/contact lists: Until you opt out or unsubscribe.
- Anonymised research/supervision records: May be retained indefinitely.

## 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 (sharing reports/feedback with HR, managers, leadership)
- 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

This ensures your information continues to be protected.

### **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 non-essential cookies (for example, optional analytics) if you choose to allow them. We do not rely on “legitimate interests” to set non-essential cookies.

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

You have rights under UK data protection law, including: access, rectification, erasure, restriction, portability, objection, and withdrawal of consent. To exercise these, contact us at [connect@commonpathconnection.com](mailto:connect@commonpathconnection.com).

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

April 2026