

Change Innovation Ltd — Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

Our website and services are not intended for children, and we do not knowingly collect personal information relating to children.

Contact details

Email: sarra@change-innovation.business

What information we collect, use, and why

We collect or use the following information to provide and improve products and services for clients:

- Names and contact details
- Occupation
- Third party information (such as colleagues or other relevant parties mentioned during our work)
- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (details of payments to and from us and the products and services you have purchased)
- Usage data (how you interact with and use our website, products and services)
- Information relating to compliments or complaints
- Audio and video recordings (for example, recorded calls and workshops)
- Records of meetings and decisions
- Website user information

We collect or use the following personal information for the operation of client or customer accounts:

- Names and contact details
- Purchase or service history
- Account information, including registration details
- Marketing preferences

We collect or use the following personal information for information updates or marketing purposes:

- Names and contact details
- Profile information
- Marketing preferences
- Purchase or account history
- Website and app user journey information
- IP addresses

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Client account information
- Any other personal information required to comply with legal obligations

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Payment details
- Account information
- Purchase or service history

- Call recordings
- Customer or client accounts and records
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a lawful basis for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights, which are set out in brief below. You can find out more about your data protection rights, and the exemptions which may apply, on the ICO's website:

- **Your right of access** – You have the right to ask us for copies of your personal information.
- **Your right to rectification** – You have the right to ask us to correct or complete personal information you think is inaccurate or incomplete.
- **Your right to erasure** – You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** – You have the right to ask us to limit how we use your personal information.
- **Your right to object to processing** – You have the right to object to the processing of your personal data.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis, you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

To provide and improve products and services for clients:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we collect or use your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Change Innovation uses clients' and prospective clients' contact and business information to deliver its consulting, training and advisory services, to understand who it works with, and to improve what it offers. This is necessary because we cannot provide or refine our services without knowing who our clients are, what they need, and how our services are used. We process only business and professional information, we do not use sensitive data for this purpose, and we do not make automated decisions that significantly affect people. The information is used in ways a client would reasonably expect from a professional services relationship, so the benefit to our business is balanced against a low risk to the individuals concerned.

For the operation of client or customer accounts:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we collect or use your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Change Innovation uses clients' contact, account and service-history information to set up and manage the working relationship, keep accurate records of engagements, and respond to clients efficiently. This is

necessary because we cannot administer a professional engagement without holding basic records of who the client is, what has been agreed, and what has been delivered. We hold only the information needed to run the relationship, we do not use sensitive data, and the processing carries little risk to the individuals concerned. Managing accounts in this way is a standard and expected part of a consulting relationship, so our interest in doing so does not override the interests of the people involved.

For information updates or marketing purposes:

- **Consent** – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. You have the right to withdraw your consent at any time.
- **Legitimate interests** – we collect or use your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Change Innovation uses business contact information and engagement data to send relevant updates about its services and to identify organisations and professionals who may benefit from its work. This is necessary because a small consultancy needs to reach the right people to sustain and grow its business. We process business and professional information rather than sensitive data, we send marketing to individuals only where we have their consent, and people can opt out of communications at any time. Because the information is limited, the audience is professional, and individuals retain full control over the communications they receive, our interest in promoting our services does not unfairly override their interests.

To comply with legal requirements:

- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

For dealing with queries, complaints or claims:

- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we collect or use your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

Change Innovation uses clients' contact, account and service-history information, together with related correspondence, to investigate and resolve queries, handle any complaints, and defend or pursue claims where necessary. This is necessary because we cannot respond to or resolve an issue without access to the relevant records of what was agreed and delivered. We use only the information relevant to the matter in hand, we do not use sensitive data for this purpose, and handling queries and complaints properly benefits the very individuals raising them. Because the processing is limited to what a resolution requires and serves the person's own interests, it does not override their rights.

For more information on our use of legitimate interests as a lawful basis, please contact us using the contact details above.

Where we get personal information from

- Directly from you
- Publicly available sources
- **Third parties:** business contacts, collaborators and professional networks who introduce or refer potential clients to us, or with whom we work jointly to deliver client engagements.

How long we keep information

How long we keep your information depends on why we hold it:

- **Client engagement records and related correspondence:** 3 years after the engagement ends.

- **Accounting and tax records:** 6 years, as required by law.
- **Newsletter and marketing contacts:** until you unsubscribe or ask us to stop, after which we remove your details promptly.
- **Prospect and business-development contacts:** reviewed periodically and removed when you are no longer a live prospect.
- **Website analytics:** retained in line with our analytics provider's standard settings.

Where we are required by law to keep information for longer, we will do so.

For more information on how long we store your personal information, or the criteria we use to determine this, please contact us using the details above.

Who we share information with

Data processors

Microsoft (Microsoft 365, including Teams, OneDrive and Copilot) — cloud software and productivity services, United States.

This data processor does the following activities for us: Provides the productivity, file storage and AI tools we use to prepare and deliver our services, including email, document storage and meeting transcription.

Anthropic (Claude) — artificial intelligence software services, United States.

This data processor does the following activities for us: Provides the AI software we use to help prepare client materials and deliver our services.

Kit (formerly ConvertKit) — email marketing software services, United States.

This data processor does the following activities for us: Manages our subscriber list and sends our newsletters and marketing communications.

Substack — newsletter and publishing platform services, United States.

This data processor does the following activities for us: Hosts and delivers our newsletter and published content to subscribers.

Xero — accounting software services, United States and New Zealand.

This data processor does the following activities for us: Processes our invoicing and financial records.

Wix — website hosting, website services and built-in website analytics, United States and European Union.

This data processor does the following activities for us: Hosts our website and, through its built-in analytics, provides information about how visitors use it.

Others we share personal information with

- Professional or legal advisors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media (only with consent where an individual is identifiable)

Sharing information outside the UK

Where necessary, we and our data processors may transfer personal information outside the UK. When doing so, we make sure appropriate safeguards are in place so the information stays protected under the UK GDPR.

For further information, or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the details above.

Category of recipient: Cloud software and productivity services provider (Microsoft 365)

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

Organisation: Anthropic

Category of recipient: Artificial intelligence software services provider (Claude)

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

Organisation: Kit (formerly ConvertKit)

Category of recipient: Email marketing software services provider

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

Organisation: Substack

Category of recipient: Newsletter and publishing platform services provider

Country the personal information is sent to: United States

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

Organisation: Xero

Category of recipient: Accounting software services provider

Country the personal information is sent to: United States and New Zealand

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs); New Zealand is recognised as providing an adequate level of data protection

Organisation: Wix

Category of recipient: Website hosting and analytics services provider

Country the personal information is sent to: United States and European Union

How the transfer complies with UK data protection law: Addendum to the EU Standard Contractual Clauses (SCCs)

How we keep your information secure

We apply appropriate technical and organisational measures to protect your personal information. These include encryption of devices and of data in transit and at rest, multi-factor authentication on the accounts we use, and access limited to named recipients on a need-to-know basis. We minimise the personal data we hold and redact or replace sensitive information before processing where we can.

We have procedures in place to deal with any suspected personal data breach, and we will notify you and any applicable regulator where we are legally required to do so.

Further detail is set out in our Information Security Statement, which is available on request.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: sarra@change-innovation.business

If you remain unhappy with how we have used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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