

Privacy Notice

How Sonia Houghton Consulting Ltd uses personal information

Last updated: 24 August 2026

Data controller	SONIA HOUGHTON CONSULTING LTD (company no. 16862396)
Contact	sonia@houghton-consulting.com
ICO registration	ZC138579

Our registered office is recorded at Companies House. Please use the email address above for privacy enquiries or to request a postal correspondence address.

1. About this notice

This notice explains how we collect and use personal information when you visit our website, contact us, work with us, receive mentoring, interact with our LinkedIn company page, are introduced to us, or are represented in information supplied by one of our clients. It also explains your rights under the UK GDPR and Data Protection Act 2018.

For most business administration, consultancy, networking and mentoring activities, Sonia Houghton Consulting Ltd is the controller. When a client gives us personal information about its customers, staff, suppliers or other contacts solely so that we can perform consultancy work on the client's instructions, we normally act as that client's processor. The client remains responsible for its own privacy information and lawful basis.

2. Personal information we may collect

- Identity and professional details: name, role, organisation, professional history and LinkedIn profile information.
- Contact and communications information: business or personal email address, telephone number, postal details where needed, messages, enquiries, meeting notes and correspondence.
- Client and supplier information: contracts, instructions, project records, invoices, payment status, bank transaction references and due-diligence information.
- Networking and marketing information: professional interests, how we met, introductions, communication preferences, newsletter choices, LinkedIn messages, comments, reactions and engagement.
- Mentoring information: CVs, career history, aspirations, discussion notes and information voluntarily provided for mentoring support.
- Website and technical information: IP address in anonymised form where SiteAnalytics is enabled with consent, referrer, requested page or file, browser, operating system, device type, access time, contact-form details and security or access logs.
- Client-provided information: names, business contact details, roles, correspondence and other limited information relating to a client's customers or stakeholders where needed for an authorised project.
- Content information: authorised photographs, video, testimonials, biographies or other material intended for publication.

We do not intentionally request health information, research-participant data, criminal-offence information or other special category data. Please avoid including such information in a CV or ordinary enquiry. If it is unexpectedly provided, we will minimise its use, seek appropriate instructions and delete it where it is not required.

3. Where information comes from

We obtain information directly from you, from our website contact form, email, telephone, meetings, Google Calendar, LinkedIn and professional networking. We may also receive information from mutual contacts, clients, suppliers, publicly available professional sources such as LinkedIn or Companies House, and client systems that we are authorised to access.

If someone introduces us, we expect them to have a reasonable basis for doing so. We will normally provide this notice at or before our first substantive communication where you have not already received the relevant information.

4. How and why we use information

Activity	Purpose	Lawful basis
Enquiries and proposals	Respond, arrange meetings, understand requirements and prepare proposals.	Steps at your request before a contract; legitimate interests.
Client and supplier relationships	Deliver services, manage projects, contracts, access, billing and payments.	Contract; legal obligation; legitimate interests.
Professional networking and introductions	Maintain relevant professional relationships and make or receive introductions. We do not disclose contact details beyond reasonable expectations without permission.	Legitimate interests; consent where appropriate.
Mentoring	Review CVs and provide career or professional mentoring requested by the individual.	Steps at your request; legitimate interests; consent where required.
Marketing and updates	Send relevant business updates, invitations or future newsletters and record preferences.	Consent where PECR requires it; otherwise legitimate interests following an assessment.
Website and LinkedIn	Operate, secure and improve the website; respond to enquiries; administer our LinkedIn page and understand engagement.	Legitimate interests; consent for optional SiteAnalytics.
Legal, regulatory and business administration	Keep records, obtain professional advice, protect legal rights, prevent misuse and comply with tax, accounting or regulatory duties.	Legal obligation; legitimate interests; legal claims.
Client-controlled data	Perform authorised consultancy work using client systems or information supplied by the client.	The client determines the lawful basis; we act on documented instructions.

5. Website, cookies and SiteAnalytics

The website is hosted by IONOS. Essential technologies may be used to deliver and secure it. The IONOS privacy banner allows visitors to accept, reject or configure optional services.

IONOS SiteAnalytics is the only optional analytics service currently identified. According to the information displayed by IONOS for this website, it uses a tracking pixel or server-side log files rather than cookies. If you consent, it may process the referrer, requested page or file, browser and version, operating system, device type, time of access and an anonymised IP address used to estimate location. IONOS states that the information is processed in Germany and the European Union and retained for eight weeks. We do not currently review this analytics routinely.

You may reject optional analytics or change your choice through Privacy Settings. If new analytics, advertising tools, maps, embedded video or social-media widgets are installed, this notice and the consent settings must be reviewed before they are enabled.

6. LinkedIn

Our website contains an ordinary link to our LinkedIn company page. Merely viewing our website does not, to our knowledge, transmit information to LinkedIn through that link. If you click it or interact with our LinkedIn page, LinkedIn processes information under its own privacy policy. LinkedIn Ireland Unlimited Company is normally the controller for LinkedIn members and visitors in the UK.

Sonia Houghton Consulting Ltd also uses page information, messages, comments, reactions and page or campaign analytics to administer the page, respond to people and understand professional engagement. Clinic Motion Media Limited is an authorised administrator of our company page and processes this information only on our instructions under a data processing addendum.

7. Contact form

The website form asks for your name, email address and message. The submission is delivered to sonia@houghton-consulting.com so that we can respond. Clinic Motion Media Limited does not receive those submissions. Please do not include confidential, special category or unnecessary personal information.

Recommended form wording: We will use the information you provide to respond to your enquiry. Please see our Privacy Policy for more information.

8. Marketing choices

We do not currently operate a general newsletter, but may introduce business updates or marketing emails in future. We will follow PECR and UK GDPR, use consent where required, and provide a clear unsubscribe method. Corporate business contacts may sometimes receive relevant B2B communications based on legitimate interests where permitted.

You have an absolute right to object to direct marketing at any time.

To opt out, reply to the message or email sonia@houghton-consulting.com. We may retain the minimum information necessary on a suppression list so that we respect your choice.

9. Service providers and other recipients

We share information only where necessary and proportionate. Recipients may include:

- IONOS, for website hosting, administration, security and consent-based SiteAnalytics;
- Google Workspace, for business email, calendar, contacts and associated productivity services;
- Microsoft, for preparing documents such as contracts and other business records;
- Apple/iCloud, where business contacts, calendars or device information are synchronised on authorised devices;
- Xero, our bank-feed providers, financial institutions and our accountant, for accounting, invoicing, tax and financial administration;
- Clinic Motion Media Limited, for authorised website and LinkedIn administration, support and marketing services;
- OpenAI/ChatGPT and similar authorised productivity tools, where used to assist with drafting, analysis or administration;
- our clients' authorised systems, including their email, CRM and remote document platforms, when we work within those systems;
- professional advisers, insurers, regulators, courts, law-enforcement bodies or prospective purchasers where legally required or reasonably necessary.

Our suppliers may act as processors under contract or, for some activities, as independent controllers. We do not sell personal information.

10. Use of AI-assisted tools

We may use AI-assisted productivity tools, including ChatGPT, to help structure, draft, summarise or analyse business material. We minimise personal identifiers and do not intentionally submit CVs, special category data, research-participant data or confidential client information unless there is a documented need, appropriate authority and suitable safeguards. Names or limited professional context may be used where proportionate. Model-improvement use is disabled on the ChatGPT account currently used for this work, but the provider may still process information to deliver and secure the service.

AI output is treated as assistance rather than an autonomous decision. We do not use solely automated decision-making that produces legal or similarly significant effects about individuals.

11. International transfers

Some technology providers operate internationally and may process information outside the UK. Where UK personal information is transferred internationally, we require an applicable adequacy regulation or appropriate safeguards such as the UK International Data Transfer Agreement, UK Addendum to the EU Standard Contractual Clauses, or another lawful mechanism, together with any required risk assessment. Provider privacy notices contain further information about their locations and safeguards.

12. Retention

We keep information only for as long as necessary for its purpose, legal obligations and the establishment or defence of claims. Our working retention approach is:

- Enquiries and prospect records: normally up to two years after the last meaningful contact, unless a relationship continues or earlier deletion is appropriate.
- Client, supplier, contract and material business correspondence: normally for the relationship and up to six years afterwards.

- Accounting and tax records: normally six years from the end of the relevant financial year, or longer if legally required.
- Mentoring notes and CVs: normally for the mentoring relationship and up to 12 months afterwards, unless the individual requests earlier deletion or agrees a longer period.
- Marketing records: while communications remain relevant and permitted; opt-out or suppression information for as long as needed to respect the choice.
- Client-controlled personal data: according to the client's documented instructions and contract, then returned or securely deleted.
- IONOS SiteAnalytics: eight weeks, as stated in the current IONOS service information.
- Backups: protected and removed through the ordinary backup-replacement cycle.

We review contact and prospect records periodically. A legal hold, dispute or regulatory requirement may justify longer retention.

13. Security

We use proportionate security controls, including access restrictions, strong passwords, multi-factor authentication where available, supported and protected devices, secure remote access, confidentiality controls and backups. Business files are held on an authorised laptop and external backup drive; business documents may be prepared using Microsoft services; business email and associated contacts are held using Google services; and names and telephone numbers may be stored on a mobile phone. Client data is kept in client systems where reasonably possible.

No method is completely secure. If a personal data breach creates a risk to individuals, we will investigate and make any notifications required by law.

14. Your rights

Depending on the circumstances, you may have rights to:

- be informed about our use of your information;
- request access to it;
- correct inaccurate or incomplete information;
- request erasure or restriction;
- object to processing based on legitimate interests;
- receive certain information in a portable format;
- withdraw consent at any time where we rely on consent;
- object at any time to direct marketing; and
- complain to the Information Commissioner's Office.

Rights are not absolute and may depend on our lawful basis and legal obligations. To exercise a right, email sonia@houghton-consulting.com. We may need to verify your identity and will normally respond within one month.

15. Complaints and contact

Please contact us first if you have a concern so that we can try to resolve it. You may also complain to the Information Commissioner's Office (ICO), the UK supervisory authority:

ICO website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

16. External privacy information

IONOS privacy policy: <https://www.ionos.co.uk/terms-gtc/privacy-policy/>

LinkedIn privacy policy: <https://www.linkedin.com/legal/privacy-policy>

Google privacy policy: <https://policies.google.com/privacy>

Microsoft privacy statement: <https://privacy.microsoft.com/privacystatement>

Apple privacy policy: <https://www.apple.com/uk/legal/privacy/>

Xero privacy notice: <https://www.xero.com/uk/legal/privacy/>

OpenAI privacy policy: <https://openai.com/policies/privacy-policy/>

17. Changes to this notice

We may update this notice when our services, suppliers or legal obligations change. The latest version will be published on our website with the revision date. Material changes will be highlighted where appropriate.