



Policy Name	SEND Allies Privacy Policy
Policy Version	8
Policy Last Reviewed	1 September 2026
Next Review Due	Within 12 months

Thank you for trusting us with some information about you. We take that trust seriously and we want you to know how we use your information and why.

1. WHO IS HOLDING YOUR INFORMATION?

Name	SEND Allies Ltd
Company Registration Number if applicable	17344522
Email address	help@sendallies.org.uk
Data Retention Period(s) or the criteria we use to decide how long to keep your information	Client and casework records: retained for seven years from the end of our engagement, in line with our legal and insurance obligations. Newsletter and mailing list data: retained until you unsubscribe. Enquiry records: retained for seven years from the date of the enquiry.
If applicable, card and payment processor (3rd party) names	Paypal and GoCardless
Cookie policy	https://sendallies.org.uk/cookies/
Third parties we share information with	Dubsado - customer account software Xero - Accounting software 123Reg - website Paypal and GoCardless - third party facilities Google - email, file storage, calendar Zoom - conferencing, transcription and associated services Zapier and Make - business automation Mailerlite - newsletter / mailing list

	Selected freelance contractors and associate practitioners – providing administrative, professional, and service delivery support under contract and confidentiality agreements
	THIRD PARTIES WHO ARE NOT SENT CLIENT DATA - Voxer, Claude (Anthropic), Tidio, Linktree, Adobe.
	THIRD PARTIES NO LONGER USED Lumin - pdf editor, ChatGPT
Do we transfer your data to any organisations/countries outside the EU/UK?	Yes
IF YES, is this only to ‘adequate’ countries (check <u>THIS LINK</u> if you are not sure)	We transfer some data to the United States, where our processors are either certified under the UK extension to the EU-US Data Privacy Framework, or protected by a UK International Data Transfer Agreement (IDTA) or UK-recognised Standard Contractual Clauses. Most of the companies we use are international companies so we rely on the scale of these companies. We check the transfer mechanism in place for suppliers before using them. Further information can be obtained from the person responsible for data.
IF NO, here is a summary of the safeguards we have put in place Further information can be obtained from the person responsible for data	N/A
Do we use any automated decision making/profiling tools on your data?	No
If YES you can get more information on how we do this from the person responsible for data	
Person responsible for data within our business:	Sharon Ashmore-Mobbs, email as above
Our data regulator contact details are:	ICO - https://ico.org.uk/
Are we obliged to collect ID or finance related data for Anti Money Laundering or other legally required purposes?	No
IF YES, your ID and Finance Data will only be used for these purposes	N/A

Are we collecting information about people under 16 Yes

2. WHOSE INFORMATION DO WE COLLECT?

We process information about:

"Prospects"	contacts working at or connected with potential Clients; potential clients
"Clients"	who have bought goods or services from us, and "Client Contacts" who are individuals employed by or contracted to Clients; children for whom services have been purchased
"Suppliers", "Associates"	suppliers or potential suppliers of goods or services to us;
"Affiliates/Referrers"	who have signed up to our affiliate scheme or who have referred Prospects to us;
"Employees"	Our employees if we have any. Employees should refer for data privacy information relating to their own data to their contract of employment.

CHILDREN'S DATA

Because of the nature of our work, we hold information about children, including special category data relating to their health, education and support needs. We limit access to this information to those directly involved in delivering services to your family, apply the confidentiality and safeguarding standards set out above to all staff, associates and freelance practitioners, and do not use children's information for any purpose beyond delivering and improving our services to you.

3. OUR POLICY

We promise respectful treatment of the personal information of everyone we have contact with. We want it to be simple and clear.

This Policy explains how we do that – when and why we collect information, how we use it, the situations when other people can see or use it, and how we keep it secure.

But just to set the scene in case you don't want to read through all the details just now, we can be clear up front.

We don't sell, rent or trade email lists with anyone else.

We've split this Policy into sections, depending on who you are.

Section A is for everyone.

Section B is for you if you are or work for a business prospect.

If you are a Client or a Client Contact, Section C is for you.

Section D is for you if we have information about you purely because we are providing services to a Client.

SECTION A: FOR EVERYONE

Whoever you are, our intention is to use your information to make things work smoothly for you in your experience of dealing with us. If that's not how it turns out for you, please make sure to contact us. It's best to put things in writing, which you can do by emailing the address above.

We keep this Policy under regular review, and we may revise it as time goes on. Please check back here from time to time to make sure you've got the latest information.

A.1. OUR GENERAL APPROACH TO PERSONAL DATA

We're committed to protecting your privacy and honouring your legal rights to control how we use your personal data.

We only collect and use personal data when we need to

- because you have asked us to do something (for example, send you newsletters);
- so that we can reply to queries or complaints;
- to develop and manage our business relationships;
- to help grow our business and fulfil our contracts;
- to provide services to clients;
- to meet our legal obligations.

We try to make sure the information we hold is accurate and up to date and is no more than we need to have.

A.2. CATEGORIES OF DATA

The types of information that we will be processing depend on the nature of our relationship with you.

We may process information about you that you have yourself provided to us or published generally on the internet through social media or on other websites.

In all cases, we will have what identifying and communication information that is relevant and that we can sensibly obtain: that is, your name, email address, employer or business name, job title or position, contact address, social media addresses, and we may also capture some of the information published by you in your social media output to the extent that it may be relevant to our interactions.

If you are or work for a prospect, we will aim to obtain and process information that is relevant to our building a business relationship with you and doing business together, which may relate to your business and your personal interests.

If you are or work for a customer or supplier, we will also keep records of our interactions, the work we have done for you or commissioned from you, the progress of work, and financial and accounting records.

If we are processing information about you purely because we are providing services to others, please see Section D below. Please note that your rights may be subject to applicable exemptions.

If you have any questions or concerns about our use of your information, or how we have responded to any request about your personal data, please take it up in the first instance by emailing us at the above address.

If we can't sort it out, the official authority contact details are set out in the form above, and you can raise your concerns with them.

A.3. SOCIAL MEDIA

We have an active presence on social media. If you are using social media they are holding and using your information in accordance with their data privacy policy.

If you 'like' any of our posts or 'follow' us or contact us on social media we keep a record of that. Your replies to us, messages you send us, and your other activity linked to our posts may be seen by members of our staff and by our associates. Our contracts with them hold them to high standards of protecting your information.

A.4. NO SALE OR EXCHANGE OF YOUR DATA

We do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

A.5. DATA LOCATION AND PLATFORMS

Like most small businesses, we do not have any tailor-made software – we use mainstream packages for everything from our Client records, to email, to accounting.

Our freelance contractors and associate practitioners are normally based in the UK.

This means that some of your data may be held in the EEA, and some may be held in services in the USA or elsewhere. We have picked mainstream suppliers with appropriate security standards. Where services are provided from outside the UK or EEA, appropriate safeguards are in place in accordance with UK GDPR requirements.

A.6. WE MAY SHARE SOME OF YOUR DATA WITH THESE PEOPLE

OUTSOURCED SUPPORT AND FREELANCE PRACTITIONERS

SEND Allies uses carefully selected freelance contractors and associate practitioners to support the delivery of our services and the operation of our business.

These individuals may include:

- Administrative and virtual assistant support
- Associate advocates / practitioners delivering or supporting client services
- Professional advisors and technical support providers

Where freelancers support our services, they may have access to personal data, which may include:

- Client contact information
- Information relating to children and families
- Special category data relevant to SEND support

All freelancers and associates:

- Act only under our written instructions
 - Are bound by confidentiality agreements
 - Are required to comply with UK GDPR and Data Protection Act 2018
 - Are provided access only to the minimum data necessary to perform their role
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- Are not permitted to copy, retain, or use data for their own purposes

Formal Data Processing Agreements are in place where required by law.

SEND Allies remains the Data Controller at all times and retains full responsibility for the protection of your personal data.

For further example, if our IT support wants to check the functionality of a laptop or back up, they may need temporary access to information that may include something about you.

For example, if we invoice you, our Accountant needs to process the information in the invoice.

Our team uses our software to access any data they need. We do not permit copying or sharing by the team and actively monitor for any potential breaches.

If you want to know who is on our team, please email and ask us.

A.7. HOW LONG DO WE KEEP YOUR DATA FOR?

Your information will be kept for the length of time set out in our retention period (see Section 1, Table, above).

If you subscribed to a newsletter or updates list, you will remain on the list(s) you joined until you unsubscribe from that list.

A.8. WANT TO SEE WHAT WE HOLD ON YOU?

If you want to know what information we have about you (if any) email the address above and give us your name, email address(es). We may require you to confirm your identity before proceeding.

Provided we can legitimately disclose the information to you (see SECTION D), we will happily do a search and send you what we have.

A.9. WHAT ARE YOUR RIGHTS

You have the right to know what information we are collecting on you, and to ask us to correct it if it is inaccurate.

Depending on our legal basis for processing, you may also have the right to:

- Ask us to restrict how we use your information
- Object to us processing your information
- Receive a copy of your information in a portable, machine readable format
- Withdraw your consent at any time, where we are relying on consent

If you feel for some reason we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know and we will take appropriate action.

You have a "right to be forgotten" - but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a Client, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, taxation and our insurer's requirements.

A.10. OUR LEGAL BASIS FOR PROCESSING YOUR DATA

Apart from that, the information we hold is based on our needing the information to run our business and provide our products and services – either so we can perform our contract with you, or because we have a legitimate business interest in processing your data.

We may take transcripts from online meetings held via MS Teams, Google Meet and/or Zoom. The transcripts are a reasonable adjustment to aid with providing the business service to our clients. Transcripts are only retained for 30 days and then permanently deleted. A summary of the transcript is usually kept in the client's file. Where a transcript is kept of a meeting, participants will always be notified. Transcripts will only be disclosed to the data subject and / or their parents.

In a few situations we are processing personal data because we are under a legal obligation to do so. This principally relates to our business, accounting and tax records.

SECTION B: PROSPECTS / ENQUIRERS

Most of the information we process comes from you. We process it so we can reply to you, and when you contact us again we know what you asked before, what you were sent, and what you told us.

Typically, we are collecting name, contact details, how we came across you, and background information from you or published by you on social media or freely accessible on the internet, on why you might be interested in our products or services or a relevant contact for our business.

If we email you individually using our own email system or respond to an email sent to us at any of our business email addresses, a copy of that email will also be stored.

If you make an enquiry via our website, we will keep details of that enquiry and response for our data retention period (Section 1, Table, above).

SECTION C: CLIENTS

Once you buy something from us, we will collect information from you at the point of sale.

This will include the information we collect from Prospects (above). We collect your email address, phone number and postal address so we can provide what we have contracted to, invoice you and keep proper records of our business relationship.

We process your data to support the delivery the goods and services you have bought. We keep records of the goods/services provided to you, and information you give us, so we can support you when needed and advise you of any additional services you may need.

C.1. THIRD PARTY DATA

As well as your own personal data, we understand that you may need to provide us with personal data relating to your children, employees, your workers, or third parties (often your clients or suppliers) – depending on the services we are providing to you. We hold all such information under strict confidentiality obligations, as set out in our terms of business.

C.2. FINANCIAL AND CREDIT CARD DETAILS

When you pay us by BACS or direct transfer, we know only what the bank tells us, which is usually the name of the person who paid us and how much and the reference number.

C.3. SPECIAL CATEGORY DATA

We routinely process special category data, including health and disability related information about children, as part of delivering our services. Where we rely on your consent to do this, that consent is separate and freely given, and you can withdraw it at any time by contacting us at the email address above.

Where consent is not the basis, we process this data because it is necessary for the establishment, exercise or defence of legal claims (including SEND tribunal proceedings), or because it is necessary for reasons of health or social care, as permitted under UK GDPR. Where special category data or information relating to children is accessed by freelance practitioners, this access is strictly limited to what is necessary for service delivery and only done within the company's internal IT framework. All such data is handled in accordance with safeguarding obligations, confidentiality requirements, and professional standards.

C.4. CONSEQUENCES OF NOT PROVIDING DATA

Some information is essential for us to act for you. Where we need specific information to represent you at tribunal, prepare casework, or meet our legal and contractual obligations, we will let you know if that information is required and what happens if it is not provided - typically that we are unable to proceed with the relevant service.

SECTION D: THIRD PARTY INFORMATION

We will act in accordance with your statutory rights, subject to the exclusions and exemptions that may apply.

When we are processing data about you on behalf of a Client, we are operating under the banner of our Client's data privacy policy. We will refer any enquiry from you to them, as they are the 'data controller' responsible for dealing with your query. But we will support that by providing relevant information to our Client for passing to you.

When we are processing data about you because of a direct connection between you and our business we are acting as a 'data controller' (and operating under this policy).

SECTION E: SUPPLIERS, ASSOCIATES AND AFFILIATES

If you become a supplier, associate or an Affiliate/Referrer we keep a copy of the contract between us, and your bank details so we can pay you. We also keep a record of invoices/payments for accounting purposes.

We keep a record of the work you undertook for us/our clients along with any comments, reviews or suggestions about that work including complaints (if any) and their resolution.

This information is all needed to manage our Client relationships and our supply chain.

If we set up an Affiliate/Referrer scheme, Affiliate/Referrer data will be held in accordance with this policy. We will ask you for information when you apply, and that information will be kept to administer the scheme.

If you are a Referrer, we remind you that referrals that you make to us may only be made with the knowledge and consent of the person being referred.

4. COMPLAINTS

If you have a complaint about the way we are handling your information or how we have responded to a request for information or removal, you can take this up in the first instance by emailing us at the email address set out above.

If we can't sort it out, the relevant supervisory authority details can be found on the form above.
