



Loven Nolin Dowbiggin Partners AB (Sverige) & LND Partners Ltd (U.K.) Privacy Policy

Last updated: December 2025

Data Controller: Loven Nolin Dowbiggin Partners AB

Email: information@lndpartners.com

We take your privacy extremely seriously. This Privacy Policy explains how Loven Nolin Dowbiggin Partners AB & LND Partners Ltd U.K. (“LND Partners”) collect, use, store, and protect your personal data when providing executive coaching, leadership consulting, and executive assessment services. It complies with:

- UK GDPR and UK Data Protection Act 2018
- EU GDPR
- Swedish Data Protection Act (Lag (2018:218))

We act as the data controller for all personal data processed unless otherwise agreed in writing.

1. What personal data we collect

We may collect and process the following categories of personal data:

1.1 Identity and contact information, e.g.

- Name, job title, employer
- Business contact details (email, phone, address)

1.2 Professional background, e.g.

- CV and career history
- Organisational context and responsibility scope
- Performance information where relevant to the engagement

1.3 Coaching and assessment data, e.g.:

- Coaching goals / action plans
- Notes from coaching sessions
- Leadership diagnostic or self-assessment inputs
- Executive interview notes
- 360 feedback information
- Psychometric data (e.g., Hogan Assessments)
- Sponsor input from HR, line managers, or board representatives

1.4 Administrative and contractual data

- Engagement documentation
- Billing and financial information

1.5 National identification numbers (Sweden only)

We do **not** request Swedish personal identity numbers (*personnummer*). If such information is inadvertently supplied (e.g., on a CV), we will:

- process it only when necessary and lawful, and
- avoid storing or using it as an identifier.

Where possible, we will redact or delete such information.

1.6 Special category data

We do **not** seek to collect special category data (e.g., health data).

Where you choose to share such information to support coaching, we process it only:

- with your explicit consent, and
- only for the stated purpose.

2. Why your data is processed (Purpose of processing)

2.1 Delivery of coaching and consulting services

To provide personalised and effective support in the course of a coaching or consulting engagement, including the ability to interpret diagnostics and psychometrics; and to provide developmental input or recommendations.

2.2 Executive assessments for commissioning organisations

Where an organisation commissions an assessment, we may prepare a report including:

- High-level summaries
- Strengths and risks / derailers
- Assessment of leadership potential, role and/or organisation fit
- Developmental recommendations

We will always explain in advance what information will be shared and with whom.

2.3 Supervision and quality assurance (anonymous data only)

To maintain professional standards, we engage:

- an executive coaching supervisor
- a calibrator / peer reviewer for executive assessment reports

In both cases all data is anonymised (no names, company names, or identifiable details) and no personal data is shared. Supervisors and calibrators cannot identify you.

2.4 Contract administration

Including engagement contracting; scheduling and communication; invoicing and accounting.

2.5 Legal and regulatory obligations

Including compliance with tax and accounting law.

2.6 Service quality and operational support

Including the use of secure IT systems and approved subcontractors (see Section 4).

3. Legal basis for processing

We process your data under one or more of the following lawful bases:

3.1 Contract

Processing necessary to deliver coaching, assessment, or consulting services.

3.2 Legitimate interests

Including:

- Delivering and improving our services
- Using subcontractors for specialist support
- Maintaining service quality via anonymous supervision or calibration
- Managing secure and efficient operations

We ensure these interests do not override your rights.

3.3 Consent

Your explicit consent is required for:

- Psychometric assessments
- Any special category data you choose to share
- Sharing information not otherwise required by contract

Consent can be withdrawn at any time.

3.4 Legal obligation

Where processing is required for regulatory or statutory compliance.

3.5 Swedish Data Protection Act (Lag 2018:218)

Any processing of *personnummer* follows the Swedish rules permitting such processing only where:

- clearly justified for secure identification,
- required under law, or
- voluntarily provided and necessary for the agreed service.

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4. Who we share your data with

We share personal data only when necessary and only with appropriate safeguards.

4.1 Commissioning organisations (corporate sponsors)

If coaching or assessment is commissioned by an employer or other entity, we may share:

- agreed outcomes / goals / action plans
- high-level summaries of coaching progress
- executive assessment reports
- developmental recommendations

We do not share:

- coaching session notes
- raw psychometric results
- sensitive information

unless you explicitly consent.

4.2 Subcontractors (“Sub-processors”)

We work with carefully vetted subcontractors who may support:

- executive coaching
- assessment work
- administrative processes
- psychometric interpretation

Subcontractors process personal data strictly:

- on our documented instructions,
- for defined purposes only, and
- under GDPR-compliant Data Processing Agreements requiring them to:
 - maintain confidentiality
 - implement robust security measures
 - not appoint further sub-processors without approval
 - report data breaches promptly
 - delete/return data at the end of the engagement.

For Swedish clients, subcontractors may not process *personnummer* except where lawful under Swedish Data Protection Act requirements.

4.3 External service providers

We may also use:

- secure cloud platforms
- email and calendar systems
- encrypted storage
- psychometric service providers

All providers are subject to GDPR or equivalent safeguards.

We never sell your data.

4.4 Supervisors and assessment calibrators (anonymous data only)

To maintain professional quality:

- coaching sessions may be discussed in supervision
- assessment content may be calibrated with a peer reviewer

In all cases:

- All data is fully anonymised
- No names, company details, roles, or identifying information are shared
- Supervisors and calibrators cannot identify you

This constitutes non-personal data and is outside the scope of GDPR.

4.5 Use of AI Tools and Large Language Models (LLMs)

We do **not** share personal data with AI systems or large language models (LLMs), such as ChatGPT or automated text-generation tools.

Specifically:

- We do not upload coaching notes, assessment data, interview notes, psychometric results, or any other personal data to AI platforms.
- We do not use AI tools to generate summaries, insights, themes, reports, or interpretations based on personal data.
- Any AI tools used in our administrative processes (e.g., spell-checking, template formatting) operate only on **non-personal** or **fully anonymised** content.
- AI tools are never used for profiling or automated decision-making.

This ensures that all personal data remains under human control and within GDPR/UK GDPR-compliant systems.

5. International transfers

Where data is transferred outside the UK or EEA (e.g., due to IT tools, psychometric vendors, or subcontractors), we ensure a lawful safeguarding mechanism is in place:

- UK/EU adequacy decisions
- Standard Contractual Clauses (SCCs)
- Other approved transfer mechanisms under UK/EU GDPR

You may request details of safeguards at any time.

6. Data retention

We retain personal data only as long as necessary.

- Coaching notes: up to 7 years
- Assessment reports: 2–5 years, depending on contract
- Psychometric data: 12–24 months (vendor dependent)
- Contracts, invoices, and financial information: 6–7 years (legal requirement)

Earlier deletion can be requested unless legally restricted.

7. Your rights

Under UK GDPR, EU GDPR, and Swedish Data Protection Act, you have the right to:

- Access your data
- Correct inaccurate data
- Request deletion
- Restrict processing
- Object to processing
- Exercise data portability
- Withdraw consent at any time

Swedish clients also have specific safeguards relating to *personnummer*. You may exercise your rights at any time by contacting us.

8. Data security

We use appropriate technical and organisational measures, including:

- Encrypted, access-controlled systems
- Secure cloud platforms
- Strong passwords and two-factor authentication
- Restricted access to personal data
- Confidentiality obligations for subcontractors
- Regular security reviews

We strictly prohibit the transfer of personal data into AI systems, including generative AI or automated analytical tools, unless the data has been fully anonymised in a way that makes re-identification impossible.

9. Contact details

Please contact our Data Protection Officer with any questions, data requests or concerns:

Email: information@lndpartners.com

Supervisory authorities

- UK: Information Commissioner's Office (ICO)
- Sweden: Integritetsskyddsmyndigheten (IMY)

10. Updates to this policy

We may update this policy from time to time. The most current version will always be available upon request and will be provided when material changes are made.