



Mastery | Clarity | Wisdom
Helping Education & Non-Profit Organisations Lead with Confidence

Privacy Policy

Last Updated: April 10, 2025



Privacy Policy for MCW Mastery | Clarity | Wisdom Ltd

MCW Mastery | Clarity | Wisdom Ltd ("we," "us," or "our") is committed to protecting the privacy of our clients, prospects, and website visitors. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website (mcw.org.uk), contact us, or engage our consultancy services for academy trusts, schools, and UK charities. We are registered in England and Wales under Company Number 16300406, with our registered office at 18 Plants Brook Road, Sutton Coldfield, West Midlands, B76 1EX, UK.

1. Information We Collect

We may collect the following personal data:

- **Contact Information:** Names, genders, ages, email addresses, phone numbers, and job titles provided via contact forms, emails, phone calls, direct messages (e.g., LinkedIn, WhatsApp), or in-person consultations.
- **Consultation Data:** Notes from coaching, strategic advisory, or governance support sessions, including employment history (past and present), biographical details (e.g., hobbies, interests, pets, dietary requirements for events, birthdays) to build rapport and encourage work-life balance.
- **Meeting Transcripts and Summaries:** Verbatim or summarised notes of meetings, both virtual and in-person, captured via secure AI-powered tools, with participants informed in advance and able to object or exclude sensitive content.
- **Sensitive Data:** Health information, ethnicity, sexuality, union membership, political opinions, or DBS check disclosures, collected with explicit consent or as required under Keeping Children Safe in Education 2024 for school-based work, or for employee satisfaction surveys and attendance/performance advice.
- **Payment Details:** Bank or card information for invoicing, processed via secure third-party providers.
- **Publicly Available Data:** Information about clients and their organisations from Companies House, the Charity Commission, or the DfE's Get Information about Schools website, used for research purposes.
- **Usage Data:** IP addresses, browser types, pages visited, and time spent on our site, collected via cookies (GoDaddy dashboard, Google Analytics) and tracking pixels in email campaigns.

2. How We Use Your Information

We use your data for the following purposes:

- To deliver consultancy services, including governance coaching, strategic advisory, organisational culture improvement, and leadership mentoring, leveraging biographical data to enhance rapport and promote work-life balance.



- To support accurate notetaking, minute-writing, and reporting, we may use AI-enabled transcription and summarisation tools (e.g., Microsoft Copilot, Otter.ai, Zoom, or equivalent) in a secure and proportionate manner
- To manage client relationships, respond to inquiries, produce reports and other documents (both physical and electronic), invoice clients, and pay suppliers.
- To send marketing communications (e.g., newsletters, promotional offers, event invitations), target social media posts and send individual emails.
- To conduct employee satisfaction surveys for clients and provide clients with attendance/performance advice in connection with their workforce.
- To comply with legal obligations under English and UK laws, including tax requirements and Keeping Children Safe in Education 2024.
- To improve our website and services using anonymised analytics and tracking data.

3. Legal Basis for Processing

We only process personal data where we have a lawful basis to do so under UK GDPR. Depending on the context, we rely on one or more of the following:

- **To deliver our consultancy services.** We process client information to deliver services such as governance reviews, strategic advice, coaching, mentoring, and culture/process improvement. **Legal basis: Contract** – *this processing is necessary to fulfil our agreement with you.*
- **To summarise meetings using AI tools.** We may use secure AI-supported tools to generate summaries or transcripts of meetings (online or in person) to improve accuracy, accountability, and productivity. **Legal basis: Legitimate interests** – *where content is non-sensitive and supports service delivery; or Consent* – *where sensitive or special category data may be included.*
- **To build rapport and personalise support.** We store biographical or lifestyle information (e.g. interests, pets, birthdays, dietary needs) shared voluntarily by clients, to support long-term relationship building. **Legal basis: Legitimate interests** – *this supports our relational and values-based approach.*
- **To send marketing communications.** We may send you newsletters, offers, or event invitations tailored to your interests. **Legal basis: Consent** – *you can unsubscribe at any time.*
- **To conduct surveys or staff feedback exercises.** We run surveys or collect anonymised feedback as part of client projects related to workforce culture or performance. **Legal basis: Consent** – *especially where sensitive opinions or feedback are shared voluntarily.*
- **To meet legal and safeguarding obligations.** We may process information such as DBS checks, health data or safeguarding concerns for school-based work or compliance with Keeping Children Safe in Education. **Legal basis: Legal obligation** – *required under sector-specific rules.*



- **To invoice, pay suppliers, and manage accounts.** We use financial and contact details to generate invoices, process payments, and meet tax obligations. **Legal basis: Contract** (with clients or suppliers), and **Legal obligation** (for record-keeping under UK tax law).
- **To analyse and improve our website and services.** We use cookies, analytics tools and tracking pixels to understand how users interact with our digital content. **Legal basis: Legitimate interests** – to improve user experience; or **Consent** – for optional tracking or marketing preferences.

4. Sharing Your Information

We do not sell your data. We may share it with:

- **Third-Party Service Providers:**
 - GoDaddy (website, CRM, marketing, membership management) – DPA: <https://www.godaddy.com/legal/agreements/privacy-policy.html>
 - Microsoft 365 (spreadsheets) – DPA: <https://www.microsoft.com/licensing/docs/view/Microsoft-Privacy-Statement>
 - Eventbrite (events) – DPA: https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-data-processing-addendum?lg=en_GB
 - Zoom (virtual meetings) – DPA: <https://zoom.us/docs/en-us/privacy-and-legal.html>
 - Monday.com (project management) – DPA: <https://monday.com/data-processing-agreement>
 - Social platforms (Twitter/X, LinkedIn, BlueSky, WhatsApp) for interactions, under their respective privacy policies.
- **Sub-Contractors:** Shared via individual log-ins to our systems or with contractual safeguards for project/advisory work.
- **Professional Advisors:** Legal or HR advisors for client-related matters, on a need-to-know basis with confidentiality agreements.
- **Marketing:** Customer feedback and opinions may be used in public documents or digital channels, with consent.
- **Regulatory Bodies:** If required by law (e.g., HMRC, ICO) or to protect our rights.

5. Data Security

We implement industry-standard measures to protect your data:

- Restricted access by role, with password protection and two-factor authentication (2FA) where available (e.g., GoDaddy, Microsoft 365).
- Encryption for digital data, secure servers, and physical security (locked locations, fireproof safe for backups) at our operational office.



- Backups by providers (Monday.com, Microsoft 365, WhatsApp) and weekly local backups to an external hard drive. No transmission or physical location is fully secure, and we cannot guarantee absolute protection.

6. Your Rights

Under UK GDPR, you have the following rights:

- **Access:** Request a copy of your data.
- **Rectification:** Ask us to correct inaccurate data.
- **Erase:** Request deletion (subject to legal or contractual obligations).
- **Restriction/Objection:** Limit or object to processing (e.g., marketing).
- **Data Portability:** Receive your data in a structured format. Contact us at contact@mcw.org.uk to exercise these rights.

7. Data Retention

- **Client Data:** Retained to support ongoing rapport-building and consultancy follow-ups for the duration of the relationship plus 12 months, or 6 months if a client indisputably indicates in writing no intent to procure further service. Justified by the need to maintain relationships when interaction with us may be sporadic.
- **Billing Information:** Retained for 6 years to comply with tax laws.
- **Other Data:** Retained only as required by law. We review data relevance periodically to apply minimisation principles.

8. Cookies

We use cookies for analytics (GoDaddy dashboard, Google Analytics) and functionality, and tracking pixels in email campaigns (GoDaddy) to monitor open rates and click-throughs. A cookie consent mechanism is in place on mcw.org.uk, informing users of these purposes with opt-out options.

9. International Transfers

Data is not routinely transferred internationally. Occasional remote access by our personnel working remotely (under flexible working arrangements) from European countries (typically France, Germany, Spain, Italy, Malta, Gibraltar, Denmark, or Iceland) will be safeguarded with Standard Contractual Clauses (SCCs) and use of a secure Virtual Private Network. At the data of writing, we use NordVPN for this purpose.

10. Contact Us

For questions or complaints, email contact@mcw.org.uk or write to 18 Plants Brook Road, Sutton Coldfield, West Midlands, B76 1EX, UK. You may also contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

11. Changes to This Policy



We may update this policy; changes will be posted here with the updated date. By using our website or services, you consent to this policy.