



PRIVACY NOTICE

Document Control

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Issue	Description of Change	Approval	Date of Issue
0.1	Initial draft for comment	Reviewed by Heather McLellan	31/10/23
		Heather McLellan	02/11/23
0.2	Reviewed and updated	Heather McLellan	12/09/2025

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1. Who we are?

HKM22 Limited is the limited company for Heather McLellan, providing mentoring, coaching, speaking and consulting services regarding return to work after illness or injury. This includes physiotherapy, rehabilitation, somatic trauma informed coaching, Firstbeat Lifestyle assessments, and all services created under "Return to Work Mentor" branding.

This privacy notice explains how we use any personal information we collect about you when you use our services and this website.

HKM22 is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our services and this website, then you can be assured that it will only be used in accordance with this privacy notice.

2. What information do we collect about you?

We collect, process and retain personal information about you only when you:

- submit your information to us using the "Contact Us" form
- directly contact us (email, website or telephone)
- opt-in to our newsletter
- provide us with your business card or contact information in connection with business services

This information can include:

- name
- phone number
- email address
- client location
- visiting IP address

Unless a person voluntarily submits personal data to us (for example, by sending us an email or completing the contact form), we cannot personally identify an individual.

We use the information only for the purpose you provided to us. It may include:

- responding to your request
- sending out e-newsletters
- providing you with services.

3. How will we use the information about you?

We collect information about you to process your enquiry or manage the service we provide for you.

We will process (collect, store and use) the information you provide in a manner compatible with the UK's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it longer than is necessary.

This is what we do for the following:

- Prospects: We use your personal information to respond to any general enquiries you may have made.
- Clients & Mentees: We use your personal information so that we can deliver the service(s) contracted.
- Contractors & Associates: We use your personal information to process your payments and manage performance.
- Job Applicants: We use your personal information to assess your suitability for the role applied for.
- Website Visitors: We use your information to personalise your repeat visits. HKM22 will not share your information for marketing purposes with any other company.

4. Our legal grounds for processing your information

We may rely on one or more of the following legal grounds to process your personal information:

- Contract: Article 6(1)(b) GDPR – necessary to perform a contract.
- Consent: Article 6(1)(a) GDPR – relies on your freely-given consent.
- Legitimate Interests: Article 6(1)(f) GDPR – relates to our legitimate interests communicating with clients, prospects and mentees to market similar services that may benefit them.

5. Where we store your information?

We store personal data in digital format on secure cloud servers and systems hosted in the EU and US. Where data is stored on US servers, we rely on the Privacy Shield Framework. Access to personal data is highly restricted internally.

Any personal data collected in paper form (contracts, feedback forms, business cards, etc.) are securely filed at our office location in the UK, or are transferred to electronic systems and then securely destroyed.

6. How long do we keep your information?

We comply with data retention policies and procedures to ensure we meet legal obligations in relation to retention and deletion of personal data. Personal information will not be kept for longer than is necessary. Additional retention may apply where required for legal, tax, or regulatory purposes.

For a copy of our retention schedule email: heather@hkm22.com

7. Keeping personal data secure and disclosing your information

We have procedures and security in place to keep personal data secure once it is in our systems.

We will not share personal information with any third party organisation for market research, marketing, or commercial purposes without consent. Data processors used by us act only under our instruction, securely, and retain data only for periods we instruct.

We may share information if legally required, or to enforce agreements.

7.1. e-newsletters and Mailing Lists

We use your details to send newsletters. Provider: More than a CRM (Go High Level). You can unsubscribe anytime.

7.2. CRM

We use More than a CRM (Go High Level) to store contact requests. You can request deletion anytime.

8. Access to your information and correction

You have the right at any time to:

- Ask for a copy of your information held by us
- Ask us to correct inaccuracies
- Request deletion of your data
- Object to marketing communications

Requests: email heather@hkm22.com or write to HKM22 Limited, 9 Jacksons Ley, Middleton, Wirksworth, Nr Matlock, Derbyshire, DE4 4NX.

If unresolved, complaints can be made to the ICO: <https://ico.org.uk/concerns/>

9. Children's privacy

Our services are not directed towards anyone under 16. We do not knowingly collect data from children. If you believe your child has provided us with data, please contact us and we will remove it.

10. Cookies

Cookies are text files used to track visitor behaviour and compile website statistics.

More info: www.aboutcookies.org | www.allaboutcookies.org

You can disable cookies in your browser, but some website features may not function.

11. Other websites

Our website contains links to other websites. This privacy notice does not cover those sites. We encourage you to read their privacy statements.

12. Changes to our privacy notice

We review our notice regularly and update it on this webpage. Last updated: 12th September 2025.
HKM22 Limited is a registered Data Controller with the ICO.

13. How to contact us

Please contact us if you have questions about this privacy notice:

■ Email: heather@hkm22.com

Data Compliance Manager

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