



# DATA PROTECTION POLICY

## Impact Justified Ltd

<b>Document Owner:</b>	John Edwards, Founder
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<b>Date:</b>	30.01.2026
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### 1. Introduction

Impact Justified Ltd is committed to protecting the privacy and security of personal data. We recognise that the proper handling of personal information is fundamental to maintaining trust with our clients, stakeholders, and the communities we work with.

This policy sets out how we collect, use, store, and protect personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It applies to all personal data processed by Impact Justified Ltd, whether relating to clients, stakeholders, research participants, or other individuals.

Impact Justified Ltd is registered with the Information Commissioner's Office (ICO) as a data controller.

### 2. About Us

Impact Justified Ltd is a consultancy specialising in social value, sustainability, and wellbeing impact assessment. We work with infrastructure investors, public sector bodies, and purpose-driven organisations across sectors including nuclear, defence, water, energy, transport, and healthcare.

Our work frequently involves collecting and analysing personal data as part of stakeholder consultations, wellbeing assessments, and social impact research. We take our responsibilities as both a data controller and data processor seriously.

#### **Data Controller Contact:**

John Edwards, Founder  
Email: [john@impactjustified.co.uk](mailto:john@impactjustified.co.uk)  
Telephone: 07772 235235

### 3. Data Protection Principles

We adhere to the data protection principles set out in the UK GDPR. Personal data must be:

- Processed lawfully, fairly, and in a transparent manner
- Collected for specified, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Processed in a manner that ensures appropriate security

We are also accountable for demonstrating compliance with these principles.

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#### **Impact Justified Limited**

Registered in England & Wales | Company No. 16831244 | VAT No. 507 8931 67

Registered Office: Lynmere Moss Farm, Delamere, CW8 2JD

## 4. Personal Data We Collect

In the course of our work, we may collect and process the following types of personal data:

### 4.1 Client and Business Contact Data

- Names, job titles, and professional contact details
- Organisation and role information
- Communication records and correspondence

### 4.2 Stakeholder and Research Participant Data

- Names and contact details (where provided)
- Demographic information relevant to research or consultation
- Survey responses, interview transcripts, and consultation feedback
- Wellbeing assessment data

### 4.3 Special Category Data

Our work in wellbeing impact assessment and social value research may involve collecting special category data, including information relating to health, ethnicity, or other sensitive characteristics. We only collect such data where it is necessary for the specific purpose of our work, and we do so with explicit consent from individuals.

## 5. Lawful Basis for Processing

We process personal data on the basis of consent. Before collecting personal data for research, stakeholder engagement, or wellbeing assessment purposes, we obtain clear and informed consent from individuals. This consent explains what data we are collecting, why we need it, how it will be used, and how long it will be retained.

For special category data, we rely on explicit consent as our lawful basis for processing. Individuals have the right to withdraw their consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

## 6. How We Use Personal Data

We use personal data for the following purposes:

- Conducting social value and wellbeing impact assessments
- Analysing stakeholder feedback and consultation responses
- Producing research reports and recommendations for clients
- Managing client relationships and delivering contracted services
- Communicating with stakeholders and research participants
- Meeting legal and regulatory obligations

We do not use personal data for automated decision-making or profiling.

## 7. Data Sharing

We do not sell, rent, or trade personal data. We do not share personal data with third parties for their own purposes.

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Where we process data on behalf of clients, we may share anonymised or aggregated findings as part of our deliverables. Individual-level personal data is not shared unless explicit consent has been obtained or there is a legal obligation to do so.

Should we engage associates or subcontractors who require access to personal data, we will ensure appropriate data processing agreements are in place and that they are bound by equivalent confidentiality and security obligations.

## 8. International Transfers

We store personal data using Microsoft OneDrive, which may involve data being processed in data centres located outside the United Kingdom. Where this occurs, transfers are protected by appropriate safeguards, including Microsoft's compliance with approved data transfer mechanisms and standard contractual clauses.

We do not otherwise transfer personal data outside the UK.

## 9. Data Security

We take the security of personal data seriously and have implemented appropriate technical and organisational measures to protect it. These include:

- Two-factor authentication on all systems storing personal data
- Password protection on files containing personal or sensitive data
- Secure cloud storage using Microsoft OneDrive with encryption
- Regular review of access controls and security arrangements
- Cyber Essentials certification, demonstrating our commitment to cyber security best practice

We regularly review our security measures to ensure they remain appropriate to the risks.

## 10. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected. Our standard retention period is six years from the conclusion of a project, which aligns with the limitation period for contractual claims.

At the end of the retention period, personal data is securely deleted or anonymised. Where data has been anonymised for research purposes, the anonymised data may be retained indefinitely as it no longer constitutes personal data.

Specific retention periods may be agreed with clients where their requirements differ.

## 11. Your Rights

Under UK data protection law, individuals have the following rights in relation to their personal data:

- Right of access – to obtain a copy of the personal data we hold about you
- Right to rectification – to have inaccurate personal data corrected
- Right to erasure – to have personal data deleted in certain circumstances
- Right to restrict processing – to limit how we use your data in certain circumstances
- Right to data portability – to receive your data in a structured, commonly used format
- Right to object – to object to processing based on legitimate interests
- Right to withdraw consent – where processing is based on consent

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To exercise any of these rights, please contact John Edwards at [john@impactjustified.co.uk](mailto:john@impactjustified.co.uk). We will respond to requests within one month.

## 12. Data Breaches

In the event of a personal data breach, we will assess the risk to individuals and, where required, notify the Information Commissioner's Office within 72 hours. Where a breach is likely to result in a high risk to individuals, we will also notify those affected directly.

We maintain records of all data breaches, including those that do not require notification.

## 13. Complaints

If you have concerns about how we handle your personal data, please contact John Edwards at [john@impactjustified.co.uk](mailto:john@impactjustified.co.uk) in the first instance. We take all concerns seriously and will investigate and respond promptly.

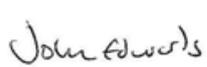
You also have the right to lodge a complaint with the Information Commissioner's Office:  
Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113  
Website: [www.ico.org.uk](http://www.ico.org.uk)

## 14. Review

This policy will be reviewed annually, or sooner if there are changes to legislation, our business activities, or following any data protection incident. The policy is available to clients and stakeholders on request.

### Declaration

I confirm my commitment to this Data Protection Policy and will ensure that it is implemented in all business activities.

<b>Signed:</b>   <hr/> John Edwards Founder, Impact Justified Ltd	<b>Date:</b>  30.01.2026 <hr/>
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