

Sort My Life: Customer Privacy Notice



Registered name: Amy Fleming - Sole Trader

I am the controller of your personal data. For more information on controllers and their responsibilities please see ICO guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

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My Contact details.

Telephone: 07413400503

Email: amy@sortmylife.co.uk

What information I collect, use, and why

I collect or use the following information **for safeguarding or public protection reasons**:

- Name, address and contact details.
- Emergency contact details
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Records of meetings and decisions
- Notes on any concerns related to client wellbeing or safety where action may be required in line with safeguarding procedures.

I collect or use the following personal information **to comply with legal requirements:**

- Name
- Contact information.
- Health and safety information
- Financial information
- Insurance details
- Tax information.
- Safeguarding information

I collect or use the following personal information **for information updates, marketing or market research purposes:**

- Names and contact details.
- Marketing preferences
- Records of consent, where appropriate
- Client testimonials and feedback, with consent, for service improvement and marketing materials.

I collect or use the following personal information for **dealing with queries, complaints or claims:**

- Names and contact details.
- Addresses
- Payment details
- Purchase or service history.
- Witness statements and contact details.
- Customer or client accounts and records
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Notes from meetings or conversations relevant to resolving the query or complaint, and records of outcomes for quality assurance purposes.

I collect or use the following personal information **to provide one-to-one lifestyle and household support services to clients and maintain records of services delivered:**

- Name, address and contact details.
- Emergency contact details
- Photographs
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Payment details (including card or bank information for transfers and direct debits)
- Records of meetings and decisions
- Records of consent, where appropriate

- Notes on client preferences, accessibility needs, and practical information necessary to deliver personalised support safely and effectively.

Lawful bases and data protection rights

Under UK data protection law, I must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis I rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask me for copies of your personal information. You can request other information such as details about where I get personal information from and who I share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how I can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that I transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When I use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, I must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

My lawful bases for the collection and use of your data

My lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Consent - I have permission from you after I gave you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – I must collect or use your information so I can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I am collecting or using your information because it benefits you, my organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. My legitimate interests are:

As part of my work through Sort My Life, I occasionally support individuals who may have specific needs, vulnerabilities, or circumstances that require additional care, discretion, or safeguarding awareness. In these cases, it may be necessary to collect or use limited personal information—such as health-related details or wellbeing indicators—to ensure that the service I provide is safe, appropriate, and responsive to the person's situation. This processing is based on legitimate interest: it enables me to adapt my support in ways that protect the individual's wellbeing, uphold dignity, and prevent harm. For example, I may need to know if someone has mobility challenges, cognitive differences, or emotional needs that affect how I structure tasks, communicate, or plan logistics. I only collect such information when it is relevant, proportionate, and shared voluntarily, and I never use it for marketing or profiling. The benefit of this approach is that it allows me to deliver a service that is genuinely person-centered, respectful, and protective. It helps me identify when someone may be at risk—whether due to isolation, unmet needs, or environmental factors—and take appropriate steps, such as adjusting my service, seeking consent to involve trusted contacts, or signposting to relevant support. These actions are taken with care and transparency, and only when they serve the individual's best interest. I recognise that safeguarding data is sensitive and that its misuse could cause distress or breach trust. That's why I apply strict boundaries: I do not collect more than is necessary, I do not share without consent unless there is a serious risk of harm, and I store any safeguarding-related information securely and temporarily. My aim is never to override someone's autonomy, but to support it—especially when someone may not be able to advocate for themselves. This legitimate interest does not unfairly prioritise my needs over those of the individual. On the contrary, it reflects a commitment to ethical practice, emotional intelligence, and responsible service delivery. I believe that safeguarding is not just a legal duty—it's a relational one. And when handled with care, it strengthens trust, safety, and wellbeing for everyone involved.

For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All your data protection rights may apply, except the right to object and the right to portability.

My lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Legal obligation – I must collect or use your information so I can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

My lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - I have permission from you after I gave you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – I am collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. My legitimate interests are:

As part of my work through *Sort My Life*, I occasionally share service updates, helpful resources, and relevant offerings with individuals who have expressed interest in my support. This processing is based on legitimate interest: it allows me to keep people informed about improvements, seasonal services, or new tools that may benefit their daily routines, wellbeing, or autonomy. The benefit of this communication is that it helps individuals make informed choices about the support available to them and ensures that my services remain responsive to evolving needs. For example, I may notify clients about new scheduling options, wellbeing trackers, or community-based initiatives that align with their interests or feedback. I only send updates that are relevant, proportionate, and respectful. I do not use sensitive personal data for marketing, and I never share information with third parties for promotional purposes. Individuals can opt out of these communications at any time, and I honour those preferences promptly. This processing does not override the rights or freedoms of the individuals involved. It is designed to enhance transparency, trust, and service quality—without causing undue intrusion or risk. I believe that thoughtful communication strengthens relationships and helps people feel supported, not sold to.

For more information on our use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

My lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – I must collect or use the information so I can enter or carry out a contract with you. All your data protection rights may apply except the right to object.

- Legal obligation – I must collect or use your information so I can comply with the law. All your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I am collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. My legitimate interests are:

As part of delivering my services through *Sort My Life*, I may collect and use personal information to respond to queries, resolve complaints, or manage claims. This processing is based on legitimate interest: it enables me to maintain service quality, address concerns fairly, and protect both the individual's and my own interests. When someone raises a question or complaint, I may need to access relevant personal details—such as contact information, service history, or contextual notes—to investigate the issue and provide a meaningful response. This helps ensure that any concerns are handled promptly, transparently, and with care. The benefit of this processing is that it allows me to improve my service, uphold trust, and resolve issues in a way that supports the individual's experience. It also helps me identify patterns or risks that may require adjustments to how I work. I do not collect more information than necessary, and I do not use this data for marketing or profiling. This legitimate interest does not override the rights or freedoms of the individuals involved. I handle all queries and complaints with discretion, and I offer clear options for individuals to access, correct, or restrict their data if needed. My aim is to foster respectful communication and continuous improvement, not to intrude or retain unnecessary information.

For more information on my use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

My lawful bases for collecting or using personal information **to provide one-to-one lifestyle and household support services to clients and maintain records of services delivered** are:

- Contract – I must collect or use the information so I can enter or carry out a contract with you. All your data protection rights may apply except the right to object.
- Legitimate interests – I am collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. My legitimate interests are:

As part of delivering personalised lifestyle and household support through *Sort My Life*, I collect and use personal information to tailor services to each client's needs and maintain accurate records of what has been provided. This processing is based on legitimate interest: it enables me to offer consistent, responsive, and high-quality support while ensuring transparency and accountability in how services are delivered. The benefit of collecting this information is that it allows me to adapt my approach to suit each individual's preferences, routines, and wellbeing. For example, knowing a client's preferred communication style, accessibility needs, or household priorities helps me plan and deliver support that is both

effective and respectful. Keeping records also helps me track progress, avoid duplication, and respond appropriately to queries or concerns. This processing is necessary to uphold service quality, continuity, and trust. It supports both the client's experience and my ability to operate responsibly as a sole trader. I do not collect more information than is needed, and I do not use personal data for marketing or profiling without consent. Individuals can request access to their information, ask for corrections, or opt out of non-essential communications at any time. The benefits of this processing outweigh any potential risks, as it is carried out with care, discretion, and a commitment to protecting each person's autonomy and privacy. My aim is not to prioritise my own needs, but to ensure that every client receives thoughtful, personalised support that honours their preferences and circumstances.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where I get personal information from

- Directly from you
- Family members or carers
- Publicly available sources

How long I keep information.

For more information on how long I store your personal information or the criteria I use to determine this please contact me using the details provided above.

Retention Schedule

I only keep personal information for as long as it is needed to deliver my services, meet legal obligations, or support accountability. Below is a summary of how long I retain distinct types of information:

Type of Information	Retention Period	Purpose
Client contact details	Until service ends + 6 months	For follow-up, continuity, or resolving queries
Service records and session notes	Until service ends + 12 months	To support accountability, reflection, and quality improvement
Consent forms and service agreements	6 years	For legal compliance and audit trail
Complaints or query records	2 years	To support fair resolution and protect both parties
Financial records (invoices, payments)	6 years	Required by HMRC for tax and accounting purposes

Marketing preferences and opt-in records	Until consent is withdrawn or updated	To honour communication preferences and ensure respectful contact
Safeguarding-related information	Until risk is resolved + 12 months	To support safe, proportionate responses and document duty of care

I regularly review what I hold and delete or anonymise information when it is no longer needed. If you would like to access, correct, or request deletion of your data, just let me know — I will respond with care and clarity.

Who I share information with

Data processors

Cloud-based productivity and data management tools – Technology sector, UK and EU-based

This data processor does the following activities for me: It provides secure cloud-based tools to help me manage client information, scheduling, communication, and service records:

Others I share personal information with

- Organisations I need to share information with for safeguarding reasons.
- Professional advisors
- Organisations I am legally obliged to share personal information with

Duty of confidentiality

I am subject to a common law duty of confidentiality. However, there are circumstances where I will share relevant health and care information. These are where:

- you've provided me with your consent (I have taken it as implied to provide you with care, or you have given it explicitly for other uses).
- I have a legal requirement (including court orders) to collect, share or use the data.
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime).
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or

- If in Scotland – I have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

How to complain

If you have any concerns about my use of your personal data, you can make a complaint to me using the contact details at the top of this privacy notice.

If you remain unhappy with how I've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>