



PATHWAYX

PRIVACY NOTICE

For learners, parents and guardians, schools, employers and other contacts

Legal entity	PathwayX Ltd
Company number	NI742566
Registered office	8 Grange Road Lane, Dundonald, Belfast, BT16 1GH
Data protection contact	Ben Glasgow, Director and Data Protection Lead
Version and effective date	Version 1.0 - 4 August 2026
Next scheduled review	4 August 2027

Our approach: PathwayX collects only the information it needs to deliver careers education, mentoring and advisory services, manage relationships and keep people safe. We do not sell or rent personal information and we give children's information a higher level of protection.

FINAL - ADOPTED, SIGNED AND PUBLISHED

Read with the applicable Terms of Business and Child Protection & Safeguarding Policy.



Contents

This notice uses plain language and includes a short summary for young people. The full sections explain the details and form the complete privacy information.

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Need this explained differently?: Ask a parent, guardian, teacher or PathwayX. You can contact us at pathwayx.coaching@gmail.com. We will provide a clearer or more accessible explanation where reasonably possible.



Privacy at a glance

This page is written especially for young people. It is a summary, so please read the rest of the notice or ask a trusted adult if you want more detail.

What information might PathwayX have about me?

- your name, age or school year, school and contact details;
- a parent or guardian's details when you are under 18;
- your goals, applications, work you ask us to review and notes needed to support you;
- attendance, feedback and agreed messages about sessions; and
- health, accessibility or safeguarding information only where it is genuinely needed to support or protect you.

What do we do with it?

We use it to arrange and deliver mentoring, workshops and careers support, communicate safely, improve the service, keep accurate records and respond if somebody may be at risk. We do not sell it, use it for personalised advertising, or let a computer make an important decision about you on its own.

Who might see it?

Only people who need it for the service, administration or safety. This can include authorised PathwayX personnel, your parent or guardian where appropriate, your school or the organisation arranging the service, trusted service providers, and safeguarding or emergency professionals where necessary.

Your information, your rights: Children have data protection rights too. You can ask what information we hold, tell us if it is wrong, ask us to stop certain uses or ask for deletion where the law allows. A parent or guardian can help, but we will also listen to you and consider your understanding, wishes and best interests.

Safety comes first: A mentor cannot promise to keep a safeguarding concern secret. If we think you or somebody else may be at risk, we may record and share the minimum necessary information with the right people so help can be provided.



1. Who we are and when this notice applies

PathwayX: PathwayX Ltd, a company registered in Northern Ireland under company number NI742566. Our registered office is 8 Grange Road Lane, Dundonald, Belfast, BT16 1GH.

Contact: Ben Glasgow, Director and Data Protection Lead. Email: pathwayx.coaching@gmail.com. This role is PathwayX's internal data protection contact and is not described as a statutory Data Protection Officer.

This notice applies when PathwayX decides why and how personal information is used in connection with PathwayX One, PathwayX Schools, PathwayX Reach, enquiries, events, website use, payments, complaints and business relationships. It covers learners, parents and guardians, school and employer contacts, event participants, website visitors and other people who communicate with us.

Controller and processor roles

For direct mentoring, enquiries, our own administration, marketing, safety and relationship management, PathwayX is normally the data controller. That means we decide the purposes and essential means of the processing described here.

For some school or employer projects, the client may decide the purpose and instruct PathwayX how to use a particular dataset. PathwayX may then act as a processor under a written data-processing agreement. In that situation, the client's privacy notice explains its decisions and requests should normally be made to that client; PathwayX will support it as required. Some projects involve each party acting as an independent controller for its own records. The Order Document or data agreement should confirm the role for each dataset.

What this notice does not cover

Recruitment, personnel and AccessNI applicant information should be covered by a separate applicant or workforce privacy notice. Third-party websites and services linked from PathwayX are responsible for their own privacy information.

Data protection law: PathwayX applies the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations where relevant, and current ICO guidance. Children's best interests and need for higher protection are built into our decisions.



2. The information we collect and where it comes from

Depending on the service and relationship, we may collect:

- **Identity and contact information.** Name, preferred name, age or date of birth where needed, school year, school or organisation, email, telephone number, address and parent or guardian contact details.
- **Service and learning information.** Career interests, goals, qualifications or predicted grades, chosen opportunities, CVs, application drafts, practice answers, interview or assessment feedback, agreed action plans and progress notes.
- **Booking and participation information.** Service selected, attendance, scheduling, communication preferences, session records, questions, approved-channel messages and feedback.
- **School, employer and business information.** Professional contact details, role, organisation, project requirements, order documents, correspondence, reports and relationship history.
- **Payment and transaction information.** Payer name, billing information, payment status, invoices and transaction references. Card information is normally handled by the payment provider rather than stored by PathwayX.
- **Health, accessibility and safeguarding information.** Only the minimum information necessary to make reasonable adjustments, respond to an emergency, manage risk or protect a child or another person.
- **Images, audio and testimonials.** Photographs, video, audio, quotes or case studies only where the specific purpose, permissions and use have been agreed in advance.
- **Technical and security information.** IP address, device/browser details, access times, security logs, cookie choices and online interaction information where a website or approved platform provides it.
- **Concerns, complaints and legal records.** Information supplied in a concern, complaint, data-rights request, incident, dispute, insurance matter or professional-advice process.

Where information comes from

We usually receive information directly from the person concerned, an adult customer, parent or guardian, or through their interaction with PathwayX. We may also receive it from a school, college, employer, event partner, authorised representative, payment or platform provider, publicly available professional source, or a safeguarding or statutory body. Where we receive information from another source, we provide or support appropriate privacy information unless the law permits an exception.

Information we need

Identity, contact, age/guardian, booking, payment and relevant service information may be required to form or perform a contract, deliver the service safely or comply with law. If required information is not provided, we may be unable to accept a booking, provide part of the service or permit participation. Marketing, photographs, testimonials and most feedback are optional and refusing them does not reduce the core service.



3. How and why we use personal information

We identify a lawful basis before using personal information. The basis can vary according to the person, service and data role. Where PathwayX acts only as a processor, the client decides the lawful basis.

Purpose	What this includes	Lawful basis normally used
Enquiries, booking and direct services	Respond, assess suitability, create an order, arrange sessions, deliver mentoring/workshops, provide feedback and manage agreed support.	Contract or steps requested before contract for an adult customer/learner. Legitimate interests in delivering an arranged service to a child or organisational participant.
School and employer delivery	Plan and deliver PathwayX Schools or Reach projects, coordinate participants, share agreed resources and report on delivery.	Contract and legitimate interests. The client may determine the basis where PathwayX acts as processor.
Payments and business records	Take payment, issue invoices, maintain accounts, prevent fraud, recover debts and meet tax/company duties.	Contract, legal obligation and legitimate interests in protecting the business and enforcing agreements.
Safe, suitable and inclusive delivery	Confirm age/guardian arrangements, make reasonable adjustments, manage conduct and risk, and respond to health or emergency needs.	Contract, legitimate interests, legal obligation and, in a genuine emergency, vital interests. Extra conditions apply to health data.
Safeguarding and protection	Record concerns, seek advice, share minimum necessary information and cooperate with schools, HSC Trusts, PSNI or other authorised bodies.	Legitimate interests, legal obligation or vital interests, depending on the facts. Extra statutory conditions apply to sensitive or offence information.
Service quality and development	Review attendance and feedback, train personnel, manage complaints, audit delivery and use anonymised or aggregated insight where practical.	Legitimate interests in running and improving safe, effective services. Consent where a genuinely optional identifiable use requires it.
Security and legal protection	Control access, keep logs, detect misuse, manage incidents, obtain legal/insurance advice and establish, exercise or defend claims.	Legitimate interests and legal obligation; legal claims conditions where sensitive information is necessary.
Marketing and relationship contact	Send requested updates and, where lawful, relevant service news to adults and professional contacts; manage opt-outs.	Consent where required by PECR; otherwise legitimate interests, including permitted business-to-business contact or a valid soft opt-in.
Photography and publicity	Use a specifically approved image, recording, quote, testimonial or case study for the stated audience and channels.	Consent is normally used for optional identifiable publicity, with separate permissions and extra safeguards for children.

Our legitimate interests

Where we rely on legitimate interests, those interests are to provide and improve careers support, communicate with clients and participants, protect people and systems, administer the company, maintain professional relationships, prevent misuse and protect legal rights. We assess necessity, reasonable expectations and privacy impact, give extra weight to children's rights and best interests, and use a different basis where those interests are overridden.



Consent: Where consent is our basis, it must be specific, informed and freely given. It can be refused or withdrawn at any time without affecting earlier lawful use. Withdrawing optional consent does not affect the core service, although we will explain if it means a particular optional feature can no longer be provided.

4. Children, sensitive information and safeguarding

Children's information

Children have the same data protection rights as adults and merit specific protection. We use clear, age-appropriate explanations, collect only what is proportionate, design child-facing processes with privacy in mind and treat the child's best interests as a primary consideration. An adult normally contracts for PathwayX One where the learner is under 18, but the personal information and rights remain those of the child.

Health and other special-category information

PathwayX does not routinely seek special-category information. Where health, disability, ethnicity, religion or another protected category is genuinely necessary, we identify both an Article 6 lawful basis and an Article 9 condition. Depending on the purpose, this may include explicit consent, vital interests, legal claims, or substantial public interest with a condition in Schedule 1 to the Data Protection Act 2018 and an appropriate policy document where required.

Safeguarding and criminal-offence information

A disclosure or concern can include sensitive information or information about an alleged offence. We process only what is necessary to protect a child or another person, seek advice, make a referral or comply with law. Where applicable, we rely on Article 9(2)(g) and/or Article 10 of the UK GDPR together with the safeguarding condition in paragraph 18 of Schedule 1 to the Data Protection Act 2018, or another valid condition that fits the facts.

Confidentiality is not secrecy: We may share safeguarding information without consent where this is necessary and lawful to protect a child or another person. We share the minimum necessary, through an appropriate route, and record the reason. The Child Protection & Safeguarding Policy explains the operational process.

Parental involvement and the child's voice

A parent or person with parental responsibility may exercise a child's rights where the child is not competent to do so and this is in the child's best interests. Where a child can understand the right and its consequences, we may deal directly with them or involve the parent with the child's authority or where clearly appropriate. We may withhold information from a parent where disclosure would be unlawful, breach another person's rights or create a safeguarding risk.



Automated decisions and AI

At the date of this notice, PathwayX does not make decisions producing legal or similarly significant effects through solely automated processing, and it does not use children's information for targeted advertising. Identifiable child, safeguarding or special-category information must not be placed into unapproved generative-AI tools. Before introducing high-risk profiling, significant automated decisions or a child-facing online feature, PathwayX will assess the risks, complete a data protection impact assessment where required and update its privacy information before the new use starts.

5. Who we share information with

We may share relevant information with:

- **Authorised PathwayX personnel.** Only those who need access for delivery, administration, safety, governance or support and who are subject to appropriate confidentiality and conduct duties.
- **Parents and guardians.** Where appropriate for the service, authority, payment, welfare or rights of an under-18 participant, while taking account of the child's wishes, competence, best interests and confidentiality.
- **Schools, colleges, employers and delivery partners.** Where they arrange, host or receive the service, or where an agreed report, data-sharing arrangement or safeguarding need applies.
- **Service providers.** Vetted providers of website hosting, forms, scheduling, communications, cloud storage, video conferencing, payments, accounting, IT support and document management, acting under suitable terms.
- **Professional advisers and insurers.** Accountants, auditors, lawyers, safeguarding advisers, insurers and brokers where necessary for advice, assurance, cover or claims.
- **Authorities and protection services.** HSC Trust Gateway Teams, PSNI, emergency services, courts, regulators, the ICO or other authorised bodies where necessary and lawful.
- **A successor or transaction party.** If the company or a service is reorganised, transferred or acquired, subject to confidentiality, due diligence, fairness and appropriate notice.

No sale of personal information: PathwayX does not sell or rent personal information. We require service providers to protect information and use it only for the agreed service or another lawful purpose stated to the individual.

6. International transfers

Some technology or support providers may process information outside the United Kingdom. Before making a restricted transfer, PathwayX checks the destination, role and legal mechanism. Where required, we use UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful safeguard, together with a transfer risk assessment and proportionate security measures. Contact us for more information about safeguards relevant to your information.



7. How long we keep information

We keep identifiable information only for as long as necessary for the purpose, legal duties, safeguarding, complaints, insurance or claims. We review, delete, securely destroy or anonymise information when the authorised period ends. A legal hold, inquiry, active concern, dispute, insurer instruction or statutory requirement may require longer retention, and an appropriate request may justify earlier deletion.

Record type	Normal retention approach
Unconverted enquiries	12 months after the last meaningful contact, unless the person asks for earlier deletion or a continuing issue justifies retention.
Orders, contracts, invoices and accounting records	Normally 6 years from the end of the relevant company financial year, or longer where tax, audit, transaction or legal requirements apply.
Core service and attendance records	Normally 6 years after the service ends. We keep only what is needed to evidence delivery, authority, agreed arrangements, complaints or claims.
Working mentoring materials and application drafts	Normally deleted or returned within 6 months after the service ends, unless the learner asks for earlier deletion or an active matter requires longer.
Routine mentoring notes	Normally 2 years after the service ends, then deleted or anonymised, unless linked to a complaint, safeguarding matter, insurance issue or legal claim.
Safeguarding records about a child	Kept separately and normally until the child's 30th birthday, in line with the adopted safeguarding policy, unless law, an inquiry, insurer requirements or safeguarding advice requires longer.
Complaints, incidents, rights requests and legal records	Normally 6 years after closure, with longer retention where proceedings, regulatory action, safeguarding, insurance or a legal hold applies.
Photographs, recordings and testimonials	Unused material is normally deleted within 12 months. Approved published material is reviewed at least every 24 months and removed earlier where consent is withdrawn and removal is reasonably possible. Evidence of permission may be retained for up to 6 years after last use.
Marketing contacts	Until consent is withdrawn or the person objects. We review inactive records at least every 24 months and keep a minimal suppression record where needed to honour an opt-out.
Technical and security logs	Normally up to 12 months, unless an incident, legal duty or investigation requires longer.
Anonymised statistics and insight	May be kept for longer because properly anonymised information no longer identifies a person.



8. Your data protection rights

Depending on the information and lawful basis, you may have the following rights. They are not all absolute and a lawful exemption may apply, but we will explain any refusal or limitation.

- **Be informed.** Receive clear information about how your personal information is used.
- **Access.** Ask for confirmation and a copy of personal information we hold about you.
- **Correction.** Ask us to correct inaccurate information or complete information that is incomplete.
- **Erasure.** Ask us to delete information in circumstances where the right applies, including information we no longer need.
- **Restriction.** Ask us to limit use while accuracy, lawfulness or an objection is considered.
- **Data portability.** Receive certain information you provided in a structured, commonly used, machine-readable form where processing is automated and based on consent or contract.
- **Object.** Object to processing based on legitimate interests or certain other grounds. We will consider the reason and stop unless a lawful reason to continue applies.
- **Withdraw consent.** Withdraw consent at any time where we rely on it, without affecting use that was lawful before withdrawal.
- **Automated decisions.** Ask for safeguards and human review if a future solely automated decision has legal or similarly significant effects.
- **Complain.** Raise a data protection complaint with PathwayX and complain to the Information Commissioner's Office.

Your right to object: You have an absolute right to object to the use of your personal information for direct marketing. Tell us at any time and we will stop. You may also object to other uses based on legitimate interests by explaining your situation; we will stop unless we can show compelling legitimate grounds or the information is needed for legal claims.

How to exercise a right

Email pathwayx.coaching@gmail.com or write to the registered office, stating the right you want to exercise and enough information for us to identify the relevant records. We may request proportionate proof of identity or authority and clarify the request. We normally respond without undue delay and within one month after a valid request; the law permits an extension in certain complex or multiple-request cases. There is normally no fee, but the law permits limited exceptions for manifestly unfounded or excessive requests.

A child may exercise their own rights where they can understand them. A parent or person with parental responsibility may help or act where appropriate, but the right belongs to the child and we will consider competence, authority, confidentiality, other people's rights and the child's best interests.



9. Marketing, photographs, cookies and online services

Marketing

We may send an adult or professional contact information they requested. We send unsolicited email or text marketing to individuals only with valid consent or where every requirement of a permitted soft opt-in is met. Different rules can apply to corporate subscribers, but every marketing message identifies PathwayX and provides a valid way to opt out. We do not use children's information for targeted advertising or send unsolicited direct marketing to children.

Photographs, recordings, testimonials and case studies

Attendance is not consent. Before any identifiable image, audio, testimonial or story is captured or used for publicity, PathwayX documents the purpose, audience, channels, retention and permissions. For a child, we provide age-appropriate information, obtain the required parent/guardian permission and respect the child's objection or withdrawal where appropriate. Consent can be withdrawn for future use, although this may not reverse printing or lawful publication already completed or copies made outside our control. Safeguarding restrictions always apply.

Cookies and similar technologies

When the PathwayX website is launched, it will explain any cookies or similar technologies in a separate Cookie Notice and through an appropriate consent control. Technologies that are not strictly necessary will not be used unless valid consent or a specific legal exception applies. The live notice and consent tool will identify the technology, provider, purpose and duration. Browser settings may also allow users to block or delete cookies, although strictly necessary functions may then be affected.

Online sessions and platforms

Online mentoring and events use approved accounts, professional communication routes and privacy-conscious settings. Recording is off unless separately authorised. A platform provider may process account, connection and diagnostic information under its own privacy terms and/or as a PathwayX processor. Participants must not record, screenshot, livestream or redistribute another person's contribution without authorisation.



10. Security, complaints and contacting us

How we protect information

PathwayX uses proportionate technical and organisational measures including access controls, approved systems, secure transfer methods, multi-factor authentication where available, device and account security, backups, confidentiality duties, role-based access, supplier checks and incident procedures. Safeguarding records are kept separately from routine mentoring notes and access is restricted. No system is completely risk-free, but suspected loss, misuse or unauthorised access is assessed promptly and reported to the ICO and affected people where the law requires.

Data protection complaints

Send a complaint to pathwayx.coaching@gmail.com or the registered office and mark it for the Data Protection Lead. We aim to acknowledge it promptly and will in any event acknowledge receipt within 30 days, investigate without undue delay, keep you updated and explain the outcome and any action taken. You do not need to use legal terms. A safeguarding concern is acted on immediately and is not delayed while a complaint is considered.

The Information Commissioner's Office

You may complain to the ICO if you are unhappy with how your information has been handled. We would appreciate the opportunity to address the issue first, but this does not affect your right to contact the ICO. Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113. Website: [Make a data protection complaint](#).

Contact PathwayX

Data protection contact	Ben Glasgow, Director and Data Protection Lead
Email	pathwayx.coaching@gmail.com
Postal address	8 Grange Road Lane, Dundonald, Belfast, BT16 1GH
Company	PathwayX Ltd - Company No. NI742566

11. Changes to this notice

We review this notice at least annually and sooner when services, systems, providers, data roles or law change. The current version shows its effective date. If a change materially affects how existing information is used, we will bring it to the attention of affected people before the new use begins where required.

Document relationship: This public notice explains PathwayX's use of personal information. The Data Protection & GDPR Policy sets the internal rules; the Child Protection & Safeguarding Policy governs safeguarding practice; and the Terms of Business govern the service contract. None of those documents removes a person's rights under data protection law.



Formal adoption

This Privacy Notice is approved and adopted for PathwayX Ltd. It is effective from 4 August 2026 and remains subject to earlier review if services, law, guidance, systems or risk materially change.

Approved by	Ben Glasgow
Role	Founder & Director
Signature	
Approval / effective date	4 August 2026
Next scheduled review	4 August 2027