

Data Protection & Confidentiality Statement

Version 1.0

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At Bloomfield Street, we recognise that trust is built through professionalism, transparency, and the responsible handling of information. We are committed to protecting personal data, confidential information, and commercially sensitive material in line with UK and European data protection legislation, recognised information governance principles, and good operational practice.

We understand that organisations increasingly rely on third parties to support operational delivery, governance, and business improvement. As part of this work, Bloomfield Street may process, access, store, or discuss information relating to clients, suppliers, employees, stakeholders, and service users. We treat this responsibility seriously and apply appropriate safeguards to ensure information is handled lawfully, fairly, securely, and confidentially at all times.

Bloomfield Street operates in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Privacy and Electronic Communications Regulations (PECR), where applicable
- Relevant European Union GDPR requirements where processing involves EU data subjects or organisations
- Applicable confidentiality, contractual, and information governance obligations
- Industry good practice and proportionate security standards

Our Commitments

Bloomfield Street is committed to:

Lawful, Fair and Transparent Processing

We only collect and process personal data where there is a clear and lawful basis for doing so. We are transparent about how information is used and ensure data processing remains proportionate, appropriate, and aligned to legitimate business purposes.

Controller and Processor Responsibilities

Depending on the nature of the engagement, Bloomfield Street may operate as a data controller, processor, or sub-processor. Appropriate contractual, confidentiality, and data protection arrangements will be established where required to ensure responsibilities are clearly defined and managed.

Where Bloomfield Street processes personal data on behalf of clients, appropriate Data Processing Agreements (DPAs) or contractual provisions will be implemented where necessary.

Confidentiality

All confidential, commercially sensitive, and personal information shared with Bloomfield Street is treated in confidence. Information is only accessed by authorised individuals where necessary to deliver agreed services or fulfil legal and contractual obligations.

We do not disclose confidential information to third parties unless:

- we have permission to do so,
- disclosure is required by law,
- or disclosure is necessary to deliver contracted services under appropriate safeguards and agreements.

Any employees, associates, contractors, or third parties acting on behalf of Bloomfield Street are expected to maintain appropriate confidentiality and information governance standards.

Data Minimisation

We only request, access, or retain information that is necessary for the delivery of services, operational support, governance activities, or contractual obligations.

Information Security

Bloomfield Street applies appropriate technical and organisational security measures designed to protect information against:

- unauthorised access,
- accidental loss,
- destruction,
- alteration,
- disclosure,
- or misuse.

Security measures may include:

- controlled access to systems and documents,
- secure password and authentication practices,
- encrypted and secure cloud-based platforms,
- secure disposal and deletion processes,
- role-based access controls,
- supplier and third-party assurance checks,
- and ongoing review of operational security arrangements.

We work with trusted technology providers and service partners where required and seek to ensure that appropriate security and data protection standards are maintained across our supply chain.

Where information is processed or stored outside the United Kingdom, Bloomfield Street seeks to ensure that appropriate safeguards and lawful transfer mechanisms are in place in accordance with applicable data protection legislation.

Retention and Disposal

Information is retained only for as long as necessary to fulfil the purpose for which it was collected, meet legal or contractual obligations, or support legitimate business requirements. When information is no longer required, it is securely deleted or destroyed in line with good information governance practice.

Individual Rights

Where applicable, Bloomfield Street supports and respects the rights of individuals under data protection legislation, including the right to:

- access personal data,
- request correction of inaccurate information,
- request erasure,
- restrict processing,
- object to certain processing activities,
- and raise concerns regarding the handling of personal data.

Requests relating to personal data or information governance matters will be handled appropriately and within relevant statutory timescales.

Third Parties and Processors

Where Bloomfield Street uses third-party systems, platforms, contractors, or suppliers that may process personal data, we seek to ensure that suitable contractual, confidentiality, and security measures are in place.

Third-party providers are selected on a proportionate risk basis, taking into account the nature of the services provided and the type of information involved.

Incident Management

Bloomfield Street takes any actual or suspected data protection or confidentiality incident seriously. Appropriate steps will be taken to investigate, contain, manage, and where required report incidents in accordance with legal and regulatory obligations.

Operational Approach

Bloomfield Street's operational model is built around practical governance, proportionate controls, and responsible business practices. We believe good information governance should support organisations to work effectively and confidently, rather than create unnecessary complexity.

We aim to embed privacy, confidentiality, and security considerations into our operational processes, systems, consultancy work, and decision-making activities from the outset.

Contact

Questions relating to this statement, confidentiality arrangements, or data protection practices can be directed to Bloomfield Street through the contact details provided on our website or via email to enquiry@bloomfieldstreet.co.uk.

Bloomfield Street reserves the right to review and update this statement periodically to reflect changes in legislation, operational practices, or regulatory guidance.