

## **2146 LTD PRIVACY POLICY**

**Policy Reference:** 2146/POL/GDPR/001

**Version:** 2.0

**Effective Date:** 01 June 2026

**Review Date:** 01 June 2027

**Approved By:** Director, 2146 Ltd

### **PRIVACY POLICY**

#### **1. Introduction**

2146 Ltd is committed to protecting and respecting the privacy of all individuals whose personal information we collect, use, store, process, and share. We understand the importance of maintaining trust and confidence in our services and are dedicated to ensuring that personal information is handled lawfully, fairly, transparently, and securely.

This Privacy Policy explains how 2146 Ltd collects, processes, stores, protects, and manages personal information in accordance with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Privacy and Electronic Communications Regulations (PECR), and all other applicable legislation.

This policy applies to all personal information processed by 2146 Ltd, including information relating to:

- Clients
- Prospective clients
- Employees
- Workers and contractors
- Job applicants
- Business partners
- Suppliers
- Commissioners
- Service users
- Website visitors
- Training delegates
- Tender and procurement contacts

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- Marketing contacts

By engaging with our services, visiting our website, communicating with us, or otherwise providing personal information, you acknowledge that your information may be processed in accordance with this Privacy Policy.

## **2. About 2146 Ltd**

2146 Ltd is a specialist consultancy and business support organisation providing professional services across healthcare, social care, recruitment, business development, compliance consultancy, digital transformation, operational management, training, and public sector procurement.

Our services include:

- Tender Writing and Bid Management
- Healthcare Consultancy
- Adult Social Care Consultancy
- CQC Registration Support
- Business Consultancy
- Recruitment and Staffing Solutions
- Supported Living Consultancy
- Domiciliary Care Consultancy
- Policy and Procedure Development
- Training and Workforce Development
- Operational Audits
- Quality Assurance Reviews
- Digital Business Development
- Marketing Consultancy
- Contract Mobilisation Support
- Regulatory Compliance Consultancy
- International Business Consultancy

For the purposes of data protection legislation, 2146 Ltd acts as a Data Controller and, where applicable, a Data Processor.

## Contact Details

### 2146 Ltd

82a James Carter Road  
Mildenhall  
Suffolk  
IP28 7DE  
United Kingdom

Email: [Hello@2146group.com](mailto:Hello@2146group.com)

Telephone: 0800 193 2148

Website: [www.2146group.com](http://www.2146group.com)

### Data Protection Contact

Email: [dataprotection@2146group.com](mailto:dataprotection@2146group.com)

Any questions regarding this Privacy Policy or the processing of personal information should be directed to the Data Protection Contact.

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## 3. Our Commitment to Data Protection

2146 Ltd is committed to adhering to the principles of data protection contained within UK GDPR.

We ensure that personal data is:

- Processed lawfully, fairly and transparently.
- Collected for specified and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.
- Retained only for as long as necessary.
  - Processed securely and confidentially.
  - Managed in a manner that demonstrates accountability and compliance.

All employees, contractors, consultants, and third parties acting on behalf of 2146 Ltd are required to comply with our data protection standards.

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## 4. Information We Collect

The type of information we collect depends on the nature of our relationship with you.

### **Personal Information**

This may include:

- Full name
- Previous names
- Date of birth
- Nationality
- Gender
- Photograph
- Signature
- Passport information
- Driving licence information

### **Contact Information**

- Home address
- Correspondence address
- Email address
- Telephone numbers
- Emergency contact details

### **Employment Information**

- CVs and résumés
- Employment history
- Qualifications
- Professional memberships
- DBS information
- References
- Training records
- Professional registrations
- Right-to-work documentation

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### **Financial Information**

- Bank account details
- Payment information
- Invoices
- Financial records
- VAT information

### **Business Information**

- Company details
- Director information
- Shareholder information
- Tender documentation
- Procurement information
- Business plans
- Contractual documentation

### **Technical Information**

- IP address
- Device identifiers
- Browser information
- Website usage data
- Login records
- Security logs

- Cookies

### **Marketing Information**

- Marketing preferences
- Event registrations
- Newsletter subscriptions
- Feedback forms
- Survey responses

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## 5. Special Category Data

In certain circumstances, we may process special category data, including:

- Health information
- Disability information
- Occupational health records
- Ethnicity information
- Religious beliefs where relevant
- Criminal records information (DBS checks)

We will only process such information where there is a lawful basis and an additional condition for processing under UK GDPR.

Additional safeguards will be implemented when processing sensitive information.

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## 6. How We Collect Information

Information may be collected:

### Directly from You

When you:

- Complete forms
- Contact us
- Engage our services
- Attend meetings
- Apply for employment
- Participate in training
- Register for events

### Through Third Parties

Including:

- Recruitment agencies
- Referees

- Local authorities
- NHS organisations
- Commissioners
- Professional bodies
- Regulatory authorities
- Publicly available sources

### **Through Technology**

Including:

- Website cookies
- Analytics software
- Security monitoring tools
- Social media platforms
- Online communication systems

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## **7. Purposes for Processing Personal Information**

We process personal information for a variety of purposes.

### **Consultancy Services**

To:

- Deliver consultancy projects
- Provide professional advice
- Develop business strategies
- Deliver operational improvements

### **Tender and Procurement Services**

To:

- Prepare tender submissions
- Manage procurement processes
- Support contract mobilisation
- Develop commercial proposals

## **Recruitment Services**

To:

- Source candidates
- Conduct recruitment activities
- Verify qualifications
- Undertake suitability checks

## **Compliance Services**

To:

- Conduct audits
- Review policies
- Assess regulatory compliance
- Support inspections

## **Training Services**

To:

- Deliver training programmes
- Maintain attendance records
- Issue certificates
- Evaluate outcomes

## **Financial Management**

To:

- Process invoices
- Receive payments
- Maintain accounting records
- Meet tax obligations

## **Regulatory Compliance**

To:

- Meet legal obligations
- Comply with regulations

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- Manage complaints
- Investigate incidents
- Support safeguarding activities

### **Marketing and Business Development**

To:

- Share updates
  - Promote services
  - Send newsletters
  - Advertise events
  - Develop business relationships
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### **8. Lawful Basis for Processing**

We process personal information under one or more of the following lawful bases:

#### **Contractual Necessity**

Where processing is necessary to fulfil contractual obligations.

#### **Legal Obligation**

Where processing is required by law.

#### **Legitimate Interests**

Where processing supports legitimate business activities.

#### **Consent**

Where individuals have freely given consent.

#### **Vital Interests**

Where processing protects life or safety.

#### **Public Task**

Where processing supports public interest activities.

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### **9. Marketing Communications**

2146 Ltd may contact individuals regarding:

- Consultancy services
- Training opportunities
- Tender alerts
- Industry updates
- Business support services
- Events and webinars

Individuals may opt out of marketing communications at any time by:

- Clicking unsubscribe links
- Contacting us directly
- Emailing [dataprotection@2146group.com](mailto:dataprotection@2146group.com)

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## 10. Website and Cookies

Our website uses cookies and similar technologies to improve functionality and user experience.

Cookies may be used for:

- Security
- Analytics
- Performance monitoring
- Website functionality
- Marketing

Users can control cookies through browser settings.

Some website features may not function correctly if cookies are disabled.

## 11. Artificial Intelligence and Automated Technologies

2146 Ltd may utilise Artificial Intelligence (AI), machine learning tools, and automated technologies to support service delivery, content development, business analysis, recruitment support, document generation, research, and operational efficiency.

Where AI tools are used:

- Human oversight remains in place.

- Personal information is protected.
  - Data minimisation principles are applied.
  - Security controls are maintained.
  - Automated processing will not solely determine significant decisions affecting individuals without appropriate safeguards.
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## **12. Social Media and Digital Communications**

2146 Ltd operates social media platforms and may communicate through:

- LinkedIn
- Facebook
- Instagram
- WhatsApp
- Microsoft Teams
- Zoom
- Email
- Telephone

Information shared through these platforms may be processed for communication, marketing, customer service, recruitment, and business development purposes.

Users should be aware that third-party platform providers maintain their own privacy policies.

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## **13. Sharing Personal Information**

We may share personal information with:

### **Regulatory Bodies**

- Care Quality Commission (CQC)
- Information Commissioner's Office (ICO)
- HMRC

### **Healthcare Organisations**

- NHS Trusts

- Integrated Care Boards
- Community Healthcare Providers

### **Local Authorities**

Where required to support commissioned services.

### **Professional Advisors**

- Solicitors
- Accountants
- Auditors
- Insurance providers

### **Technology Providers**

- Cloud storage providers
- CRM systems
- IT support providers
- Website providers

### **Recruitment and Training Partners**

Where necessary to provide services.

We do not sell personal information to third parties.

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## **14. International Transfers**

Where personal information is transferred outside the United Kingdom, 2146 Ltd will ensure appropriate safeguards are implemented, including:

- Adequacy Regulations
- Standard Contractual Clauses
- International Data Transfer Agreements

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## **15. Information Security**

2146 Ltd operates robust information security measures including:

- Encryption

- Access controls
- Secure passwords
- Multi-factor authentication
- Firewall protection
- Anti-malware systems
- Staff training
- Confidentiality agreements
- Secure disposal procedures
- Cybersecurity monitoring

We regularly review our security arrangements to protect against unauthorised access, loss, destruction, misuse, or disclosure.

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## 16. Data Retention

We retain information only for as long as necessary.

Record Type	Retention Period
Client records	7 years
Consultancy records	7 years
Tender documentation	7 years
Recruitment records	12 months
Employee records	6 years after employment
Financial records	7 years
Contracts	7 years after expiry
Complaints records	7 years
Marketing records	Until consent withdrawn
Website enquiries	24 months

Following retention periods, information will be securely deleted, destroyed, or anonymised.

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## 17. Individual Rights

Under UK GDPR, individuals have the right to:

### **Right to be Informed**

Understand how information is processed.

### **Right of Access**

Request access to personal information.

### **Right to Rectification**

Correct inaccurate information.

### **Right to Erasure**

Request deletion of information where applicable.

### **Right to Restrict Processing**

Limit processing activities.

### **Right to Data Portability**

Receive data in a structured format.

### **Right to Object**

Object to certain types of processing.

### **Rights Relating to Automated Decision-Making**

Challenge decisions made solely by automated means.

Requests should be submitted to:

[dataprotection@2146group.com](mailto:dataprotection@2146group.com)

We aim to respond within one calendar month.

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## 18. Data Breaches

2146 Ltd maintains procedures for identifying, investigating, managing, and reporting personal data breaches.

Where legally required, breaches will be reported to:

- Information Commissioner's Office (ICO)

- Affected individuals
- Relevant authorities

within statutory timeframes.

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## **19. Children and Young People**

Where services involve children or young people, additional safeguards will be applied to ensure compliance with data protection legislation and safeguarding requirements.

Parental responsibility, consent arrangements, and best-interest considerations will be applied where appropriate.

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## **20. Complaints**

If you are dissatisfied with the way we process personal information, please contact us first.

Data Protection Contact:

Email: [dataprotection@2146group.com](mailto:dataprotection@2146group.com)

Telephone: 0800 193 2148

You also have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)

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## **21. Changes to this Privacy Policy**

2146 Ltd reserves the right to amend this Privacy Policy at any time to reflect:

- Changes in legislation
- Regulatory guidance

- Business operations
- Technology developments
- Organisational requirements

The most recent version will always be available through our website and upon request.

## **22. Policy Review and Approval**

This policy shall be reviewed annually or sooner where required due to legislative, regulatory, contractual, or operational changes.

### **Declaration**

2146 Ltd is committed to maintaining the highest standards of confidentiality, privacy, information governance, cybersecurity, and regulatory compliance. We continuously review and improve our systems and processes to ensure personal information is managed responsibly, ethically, and securely, while supporting the effective delivery of our consultancy, business support, recruitment, compliance, and professional services.

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