



Privacy Policy

July 2025

1. Identity & Contact Details

Organisation: Clarity

Data controller: Daniel Clough (also 'I')

Contact: dan.clough@findclarity.uk

2. Purposes of Processing

Website Analytics: To understand traffic patterns and improve the website

Email collection: To enable content download, send updates & engage with Clarity.

Interview recording and reporting: To capture and deliver video/audio/image content to paying clients, based on consent.

Client use of interview data: For internal or public marketing, based on consent.

Service improvement, legal compliance and record keeping.

3. Lawful Basis

Data processing will be based on written consent (GDPR 6.1(a))

4. Data Recipients

Clarity: The Data Controller will have sole access to analytics data and email lists.

Interview content is not stored online. I am the only one to collect and process it.

Google (via Google Analytics): Google processes any website visitor data to Clarity's website on my behalf, based on consent. I control the data.

Clients paying for interviews: When interview content is shared for the purposes of private review or public marketing, the client becomes a data recipient.

Marketing platforms: If clients use the data for public campaigns (e.g. YouTube, Instagram), those platforms may indirectly receive data.

5. Retention Period

Clarity will keep interview data for up to 3 months, email data up to 2 years if no response, client data up to 6 years for tax if no further engagement).

6. Data Subject Rights

You have the right to be informed, access, change, delete, change your mind on how the data is used and have it removed, restrict processing, to transfer files or analytics data, to object to how your data is used.



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7. Right to Withdraw Consent

Consent can be withdrawn any time.

8. Right to Complain

If you're unhappy with how Clarity have used your data, you may complain to the ICO, using 0303 123 1113 (Mon - Fri, 9am-5pm; <https://ico.org.uk/global/contact-us/>)

9. Source of Data

The business you are a customer/client of may have referred you. If Clarity have made direct contact with you, the business you are a customer/client of will have been asked to check they have your consent.

10. Necessity & Consequences of Non-Provision

We respect your choices and will never collect unnecessary data or penalise you for declining to share it.

Website usage data: With your consent, this data helps Clarity understand traffic patterns and improve the website but are not essential.

Email address: Required if you wish to receive content or engage with Clarity's services. Not providing it will prevent you receiving reports, results and updates.

Customer referral data: Contact data is helpful for arranging and confirming interviews but not essential. Inability to gain or evidence consent will prevent interviews from taking place.

Interview data: With your consent, recordings assist with the delivery of a service to paying clients but are not essential.

11. How data is stored and transferred

Email lists: Stored in my WordPress database (MySQL), hosted on IONOS servers (using AES-XTS 256-bit encryption).

Recordings and photographs: Encrypted on the camera (AES 256-bit, fingerprint and PIN), transferred by cable to a portable hard drive stored in a safe box when not in use.

Customer referral data: The default is Blip, an app that does not store the data on any servers during transit but rather transfers direct from client to Clarity and vice versa. Other secure file sharing platforms may be used (e.g. Dropbox).