

PRIVACY & DATA PROTECTION POLICY

Cornerstone Executive Services

Joanne Gardener trading as Cornerstone Executive Services

ICO Registration Reference: ZB499584 | Last updated: September 2026

Cornerstone Executive Services provides administration, operations and project support to businesses. This policy explains how we handle personal information in our own business and how our role differs when we process information on behalf of a client.

1. Who we are

Cornerstone Executive Services is operated by Joanne Gardener as a sole trader and is supported by a small team of associates who assist with the delivery of agreed client services.

For data protection purposes, Joanne Gardener trading as Cornerstone Executive Services may act as either a data controller or a data processor, depending on the circumstances.

2. When Cornerstone is the data controller

We act as a data controller where we decide why and how personal information is used for Cornerstone's own business purposes. This may include information relating to:

- clients and prospective clients;
- business contacts, suppliers and professional advisers;
- website, email and telephone enquiries;
- quotations, proposals and contracts;
- invoicing, payments, bookkeeping and accounting records;
- our own business administration and record keeping;
- associates and service providers working with Cornerstone; and
- appropriate marketing and business-development activity.

3. When Cornerstone acts as a data processor

A significant part of our work involves providing administrative, operational and business support within systems and processes controlled by our clients. In those circumstances, the client will normally be the data controller and Cornerstone will act as a data processor on the client's behalf.

Examples include:

- inbox, correspondence and calendar management;
- customer service and client follow-up;
- customer, supplier and contact administration;
- bookkeeping, invoicing and credit control;
- order processing, stock and inventory administration;
- courier, shipping and logistics administration;
- project, event and operational support;
- travel and accommodation administration; and
- reporting, document preparation and other agreed business-support activities.

When acting as a processor, we process personal information only as necessary to provide the agreed services, in accordance with the client's documented instructions, our contractual obligations and applicable data protection law.

4. Personal information we may process

The information we process depends on our relationship with you and the services being provided. It may include:

- identity and contact information, such as names, job titles, business names, addresses, telephone numbers and email addresses;
- business correspondence, diary entries, project information and other business records;
- customer and supplier records, purchase orders, order histories and delivery information;
- financial and accounting information, including invoices, payment records and transaction information;
- information relating to employees, contractors or other personnel where relevant to services provided for a client; and
- technical information associated with our website and electronic communications, such as IP address, browser/device information and cookie data where applicable.

We aim to access and process only the information reasonably necessary for the relevant purpose or service.

5. Where personal information comes from

We may obtain personal information directly from you, from a client who has engaged us, from customers or suppliers of our clients, through business correspondence, from client-provided systems and databases, from professional advisers or service providers, or from appropriate publicly available business sources.

Where information is provided to us by a client for processing on their behalf, the client will normally be responsible for determining the lawful basis for the underlying processing and for providing privacy information to the individuals concerned where required.

6. How we use personal information

Where Cornerstone acts as controller, we may use personal information to:

- respond to enquiries and provide quotations or proposals;
- enter into, provide and manage our services;
- communicate with clients, prospective clients and business contacts;
- manage invoices, payments, bookkeeping and accounting;
- administer suppliers, associates and service providers;
- maintain appropriate business, tax and legal records;
- protect the security of our systems and information;
- establish, exercise or defend legal rights; and
- carry out appropriate marketing and business-development activities.

7. Lawful bases

Where Cornerstone acts as controller, the lawful basis will depend on the purpose of the processing. We may rely on:

Contract: where processing is necessary to enter into or perform a contract with you.

Legal obligation: where we need to process information to comply with legal, tax, accounting or regulatory requirements.

Legitimate interests: where processing is reasonably necessary to operate and protect Cornerstone, administer services and business relationships, respond to enquiries, recover sums owed, or develop our business, provided those interests are not overridden by the rights and interests of the individual.

Consent: where we have specifically requested and received consent for a particular purpose.

Where we rely on consent, it may be withdrawn at any time. Where Cornerstone acts only as a processor, the client/controller is generally responsible for establishing the lawful basis for the underlying processing.

8. Client systems and third-party platforms

The nature of our services means that we may use or access a range of third-party software, cloud platforms and client-controlled systems. These may include accounting and bookkeeping software, email and calendar platforms, cloud storage and document-management systems, customer and order-management systems, time-recording software, courier and logistics platforms, and other specialist business systems.

Depending on the assignment, these may include Xero, QuickBooks, Microsoft 365, SharePoint, Google Workspace, Dropbox, Toggl, Unleashed, MyDHL and other client-specific systems. This list is illustrative rather than exhaustive.

Some systems are selected by Cornerstone; others are selected and controlled by our clients and accessed by us only to provide the agreed services. Where we engage a provider to process personal data on our behalf, we take reasonable steps to use appropriate providers and contractual arrangements.

9. Artificial intelligence tools

Cornerstone may use artificial intelligence (AI) tools to assist with appropriate administrative, research, drafting, analysis and business-support activities.

We recognise that information entered into an AI service may constitute processing of personal data. We therefore seek to minimise personal, confidential and commercially sensitive information, use appropriate account and privacy settings where available, and review AI-generated work before it is relied upon or provided to a client.

Where Cornerstone is processing personal data for a client, use of AI is subject to the client's instructions, our contractual obligations and any applicable sub-processor requirements. Cornerstone does not use solely automated AI decision-making to make decisions about individuals that produce legal or similarly significant effects.

10. Our support team and associates

Cornerstone operates with a small support team. Associates may be given access to personal information where that access is reasonably necessary to provide agreed services.

Access is limited according to the work being undertaken. Associates who handle personal or confidential information are required to maintain confidentiality, use information only for authorised purposes, follow appropriate data-protection and security requirements, and report suspected loss, disclosure or misuse promptly.

Where an associate acts as a sub-processor in relation to client-controlled personal data, appropriate written data-processing arrangements and client authorisation are used where required.

11. Sharing personal information

We do not sell personal information.

Where necessary, personal information may be shared with or processed by categories of recipients including:

- authorised members of the Cornerstone support team and contracted associates;
- IT, software, cloud, email and document-management providers;
- accounting and bookkeeping platforms, accountants and professional advisers;
- banking and payment providers;
- courier, shipping and logistics providers;
- website and hosting providers; and
- government, regulatory, legal or law-enforcement bodies where disclosure is required or permitted by law.

Where Cornerstone is acting as a processor, disclosures are made only in accordance with the client's instructions, contractual arrangements or legal requirements.

12. International transfers

Some technology and cloud-service providers used by Cornerstone or our clients may store or process information outside the United Kingdom.

Where Cornerstone is responsible for a restricted international transfer, we seek to ensure that an appropriate mechanism recognised under UK data protection law is in place, such as applicable adequacy arrangements or approved contractual safeguards. Where we access a client-controlled system, the client's own arrangements with that provider may determine the relevant transfer position.

13. Information security

We use reasonable and proportionate technical and organisational measures designed to protect personal information against accidental or unlawful loss, destruction, alteration, disclosure or unauthorised access. Depending on the system and circumstances, these measures may include:

- password protection and multi-factor authentication where available and appropriate;
- access controls and restricted permissions;
- device security and screen locking;
- secure cloud-based systems and sharing methods;
- confidentiality obligations for associates;
- limiting access to those who genuinely require it; and
- prompt removal or adjustment of access when it is no longer required.

14. Personal data breaches

If we become aware of an actual or suspected personal data breach affecting information for which Cornerstone is controller, we will assess and respond to the incident in accordance with applicable data protection requirements.

Where Cornerstone is acting as processor, we will notify the relevant client/controller without undue delay after becoming aware of a personal data breach affecting their personal data and will provide reasonable assistance as required.

15. How long we keep personal information

We do not keep personal information indefinitely. Where Cornerstone acts as controller, information is retained for as long as reasonably necessary for the purpose for which it was collected, including providing services, maintaining appropriate business records, meeting legal, accounting and tax obligations, managing disputes and protecting legal rights.

Different records may therefore have different retention periods. Where Cornerstone acts as processor, information is normally retained in accordance with the client's instructions and contractual requirements and returned or securely deleted when required, subject to any applicable legal obligation to retain it.

16. Your data protection rights

Depending on the circumstances and the lawful basis for processing, you may have rights including access to your personal information, correction of inaccurate information, erasure in certain circumstances, restriction of processing, data portability, and the right to object to certain processing.

Right to object: you have the right to object to processing based on legitimate interests in certain circumstances, and you may object to direct marketing at any time.

Where processing is based on consent, you may withdraw that consent at any time. Not every right applies in every circumstance.

Where Cornerstone processes information solely on behalf of a client, requests concerning that information may need to be referred to the relevant client as data controller. We will provide reasonable assistance where required.

17. Marketing

We may contact existing or prospective business contacts about Cornerstone services where permitted by applicable data-protection and electronic-marketing law. Where consent is required, we will obtain it. You may ask us to stop sending marketing communications at any time.

18. Website and cookies

Our website may use cookies and similar technologies. Essential cookies may operate where necessary for the website to function or to provide functionality requested by the visitor.

Non-essential cookies, such as analytics or advertising technologies where used, will only be activated in accordance with applicable consent requirements. Further information may be provided through our website cookie notice or preference tool.

19. Children's information

Cornerstone's services are primarily business-to-business and are not directed at children. We do not intentionally collect children's personal information through our website for marketing purposes.

We may process information relating to children where it forms part of information legitimately provided by a client and is necessary for services we have been instructed to perform. In those circumstances, Cornerstone will normally act as processor and handle the information in accordance with the client's instructions.

20. Complaints

If you have concerns about how Cornerstone has handled your personal information, please contact us first so that we can investigate.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent data protection regulator. Information about making a complaint is available at ico.org.uk.

21. Contact us

Data Controller	Joanne Gardener trading as Cornerstone Executive Services
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Email	jo@cornerstonedesk.services
Telephone	+44 7458 903303
Website	cornerstonedesk.services
ICO Registration	ZB499584

22. Changes to this policy

We may update this policy to reflect changes to our services, systems, working practices or legal and regulatory requirements. The latest version will be made available on our website and the date at the beginning of the policy will be updated.

This policy is intended to provide clear privacy information about Cornerstone's processing activities. It should be read alongside any specific privacy information, contractual terms or data-processing arrangements that apply to a particular service.