

## Privacy Statement

As a professional coach our client and coaching relationship will always be built on transparency, trust and confidence in each other. Confidentiality will always be paramount. I am detailing below my privacy statement that provides you with the further confidence that I am following personal data protection laws.

I have written this statement to inform you that I am committed to protecting the privacy and security of your personal information.

This privacy notice describes how I collect and use personal information about you during and after your relationship with me, in accordance with the General Data Protection Regulation (GDPR).

This notice applies to:

1. All Clients
2. All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business including those individuals with whom we send marketing information.

Any reference to 'we', 'us', 'our', 'the company' shall mean Clare George and [www.thehealthhabitscoach.com](http://www.thehealthhabitscoach.com) as a sole trader.

Any reference to 'you' or 'Data Subject' shall mean any individual receiving this notice for whom I hold personal data.

This Privacy Statement does not include information relating to the retention of data on limited companies as such data is not incorporated within the provisions of GDPR.

In most circumstances your data will be held by me as a "Data Controller". This means that I am responsible for deciding how I hold and use personal information about you. I am required under data protection legislation to notify you about the holding of information in this privacy notice.

I may update this notice at any time.

It is important that you read this notice, together with any other privacy notice I may provide on specific occasions when I am collecting or processing personal information about you, so that you are aware of how and why I am using such information.

### DATA PROTECTION PRINCIPLES

I will comply with data protection laws including GDPR. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only if necessary for the purposes we have told you about.

6. Kept securely.

### **THE KIND OF INFORMATION I HOLD ABOUT CLIENTS**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

I will collect, store, and use the following categories of personal information about my clients.

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.

I may collect, store, and use the following categories of personal information about clients following some coaching interventions.

- Marital status and dependants.
- Location of employment or workplace.
- Next of kin details.

I will collect, store, and use the following categories of personal information about business clients.

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, medical conditions, or disabilities.

I may also collect, store and use the following “special categories” of more sensitive personal information in respect of client information arising from some coaching interventions.

- Business address and company registration number(s).
- A management contact for the business I am engaged with

### **WHY I HOLD INFORMATION ON CLIENTS**

It is necessary for me to retain data on clients in order for me to fulfil my contractual obligations and hold data for legitimate business needs.

I will only retain data which we reasonably require and for a period which is reasonably necessary. I will not disclose your data to the third parties unless you have consented for me to do so or I am otherwise required to do either contractually or under another law or enactment.

## **HOW I COLLECT PERSONAL INFORMATION**

I collect personal information about clients directly from themselves when they contact me via telephone, email, social media or my through my website and Square Space.

Client and business data is stored within a GDPR compliant Gmail cloud account and Google Workspace. Data on current clients that I am actively working with is also stored in my mobile telephone that is also password encrypted. If our coaching is carried out via Zoom or a similar communication application, contact data will be stored within the application for the duration that we are actively in a coaching relationship.

I reserve the right to change the systems in which data is stored without notification to another equivalent system but at all times I will ensure the appropriate security of your data and GDPR compliance.

## **HOW I WILL USE YOUR INFORMATION.**

I will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

I may also use your personal information in the following situations, which are likely to be rare:

1. Where I need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest (or for official purposes).

## **Situations in which I will use your personal information**

I need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases I may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which I will process your personal information are listed below.

- Administering the contract I have entered into with you.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To market other products or services which I offer which may be of interest to you.
- To inform you about updates about my services.
- To administer my business which may include disclosure of client data to my accountant.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In certain circumstances listed above, I hold your data to market other services to you, send you inspirational blogs, or send you information that I think may interest you. I have a legitimate business interest in retaining your data for this purpose, but you may 'opt out' of receiving these types of communication from me.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, I may not be able to perform the contract I have entered with you or I may be prevented from complying with our legal obligations.

### **Change of purpose**

I will only use your personal information for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose. If I need to use your personal information for an unrelated purpose, I will notify you and I will explain the legal basis which allows us to do so.

Please note that I may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **THE KIND OF INFORMATION I HOLD ABOUT INDIVIDUALS OTHER THAN CLIENTS AND HOW THIS DATA IS USED**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

During my day to day business I acquire information regarding individuals other than our clients and I will retain this data where I have a legitimate business reason to do so.

Typically, I acquire personal data on individuals, third parties and suppliers other than my clients in the following circumstances:

1. Where I have met individuals, third parties and suppliers at networking or other marketing events;
2. Where individuals, third parties or suppliers have made enquiries with me regarding possible services but have not subsequently become clients of my business;
3. Where I have dealt with individuals, third parties or suppliers in the capacity as suppliers of goods or services to me;
4. Where I have regular business-related dealings with you.

I have a legitimate business interest in retaining this data to send informative blogs, event details or other updates relating to my services or something that I believe relates to your interests. You have the right to ask me to erase or rectify your data and you have the right to opt out of receiving marketing, networking information or information I think might be of interest to you.

### **Why might I share your personal information with third parties?**

I will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where I have another legitimate interest in doing so.

### **DATA SECURITY**

I have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures may be obtained directly from me [helen@helenfostercoaching.co.uk](mailto:helen@helenfostercoaching.co.uk).

I have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where I am legally required to do so.

The transmission of information via the internet is not completely secure. I cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with me by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

### **DATA RETENTION**

#### **How long will I use your information for?**

I will only retain your personal information for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances I may anonymise your personal information so that it can no longer be associated with you, in which case I may use such information without further notice to you.

In respect of client data, you can expect me to hold data relating to your instructions for a period of seven years after completion of the last coaching interaction. The reason for this is that the Limitation Act 1980 typically provides that legal proceedings for breach of contract or negligence can be brought up to six years after the events. I therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings ensue.

Given the nature of my services clients often return to me with repeat instructions within weeks, months or years of contacting me in the first instance. The seven-year period referred to above will start from the last contact I had with the client, third party or supplier, to ensure I am able to assist as and when I need to. Should you not contact me for seven years, I will confidentially destroy all data held for you.

### **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

#### **Your duty to inform me of changes**

It is important that the personal information I hold about you is accurate and current. Please keep me informed if your personal information changes during your working relationship with me.

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information I hold about you and to check that I am lawfully processing it.
- **Request correction** of the personal information that I hold about you. This enables you to have any incomplete or inaccurate information I hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask me to delete or remove personal information where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where I am relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where I am processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask me to suspend the processing of personal information about you, for example if you want me to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that I transfer a copy of your personal information to another party, please contact Helen Foster at

Please note that where you ask me to erase, correct, object to process or seek to restrict my processing of data I may refuse your request where I have a legal obligation, contractual or other legitimate business interest to refuse your request. If I refuse your request then I will notify you of this refusal and you will have the right to appeal.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, I may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, I may refuse to comply with the request in such circumstances.

### **What we may need from you**

I may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [clare@thehealthhabitscoach.com](mailto:clare@thehealthhabitscoach.com). Once I have received notification that you have withdrawn your consent, I will no longer process your information for the purpose or purposes you originally agreed to, unless I have another legitimate basis for doing so in law.

## **DATA PRIVACY MANAGER**

I have appointed myself as a Data Privacy Manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how I handle your personal information, please contact me at [clare@thehealthhabitscoach.com](mailto:clare@thehealthhabitscoach.com). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## **CHANGES TO THIS PRIVACY NOTICE**

I reserve the right to update this privacy notice at any time, and I will provide a new privacy notice when I make any substantial updates. I may also notify you in other ways from time to time about the processing of your personal information.