# **Be Connected Coaching Limited**

Data Privacy Policy



## **Data Privacy Policy**

### **Contact details**

Name:	Be Connected Coaching Limited
Address:	7 Bell Yard, London, WC2A 2JR
Email:	beth@beconnectedcoaching.co.uk

#### Information Commissioner's Office registration number: ZB379572

This policy applies to the use of personal information gathered from you, in order to supply you and your organisation with coaching services. Personal information means any information that relates to an individual that may be used either directly or indirectly to identify them. We are the data controller and responsible for your personal data. If you have any questions about this policy including any requests to exercise your legal rights, or our privacy practices, please contact us using the contact details set out above.

We keep our policy under regular review. This version was last updated in September 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### The type of personal information we collect

We need to obtain, and (securely) store some personal information in order to provide you with coaching services. This includes:

- Your name, email address, phone number, job title and location;
- Your organisation's name plus name, email address, phone number, job title and location of the person (if not you) accountable for signing the coaching agreement with Be Connected Coaching Limited;
- Dates of contact with you and of our coaching sessions;
- Notes on our coaching sessions (which may include any personal or sensitive data that you chose to share with us in those sessions);
- Your feedback on ourcoaching sessions (if you choose to provide).

Please note that we will only collect sensitive data about you if you have provided it to us in the context of your coaching sessions and you have given us permission to collect and store it.

### How we collect the personal information and why we have it

Most of the personal information we gather and process is provided to us directly by you, or by a named person in your organisation with the authority to enter into coaching contracts, for the purposes of establishing and delivering a coaching contract with you or your organisation. This includes contacting



you/your organisation to contract the coaching, schedule sessions, issue invoices and request feedback. We also use the company information – specifically, the contract itself and any associated invoices – to keep required records for tax and insurance purposes.

Sometimes the personal data we hold is to respond to your enquiry about our services, to deliver relevant website content to you or to make suggestions and recommendations to you about our services that we think may be of interest to you. The basis for which we hold your personal data, for the above reasons, is that of legitimate interests, so that we can run and develop our business effectively and manage appropriate content on our website.

If you have engaged us to provide services to you, then under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information is that we have a **contractual obligation**.

In other words, we have contracted for the provision of coaching services to you/your organisation by Be Connected Coaching Limited.

### Your data protection rights

It's important to us that you have a clear understanding of what happens to your personal data once we have collected it. Under the EU General Data Protection Regulation (GDPR), you have specific rights including:

#### Your right of access

You have the right to ask us for copies of your personal information (commonly known as a 'data subject access request').

#### Your right to rectification

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

#### Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

#### Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

#### Your right to object to processing

You have the right to object to the processing of your personal information in certain circumstances.

#### Your right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have a maximum of one month in which to respond to you.

If you wish to make a request, please contact us at <u>beth@beconnectedcoaching.co.uk</u>.



We try to respond to all legitimate requests within one month. Occasionally it could take us longer if your request is particularly complex or you have a number of requests. You will not have to pay a fee to access your personal data, however we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it.

### How we store your personal information

Be Connected Coaching Limited is committed to safeguarding your personal information and complies with current data protection legislation including the UK Data Protection Act 2018 and the GDPR. We will not sell, distribute or lease your personal information to third parties unless we have your explicit consent to do so or are required by law to do so.

We keep electronic files containing your personal information and have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the information we collect, including password protection and anonymisation for electronic files. We keep these records for no longer than is reasonably necessary to comply with relevant legislation and will then dispose of it by anonymising any personal information we hold about you on our system and permanently removing any data which may identify you.

### Who we may share your data with

We may share limited personal data with our accountants and book-keeping service provider. This will be limited to the contact details found on our invoices. Such third parties will not have access to the notes we may create about your coaching sessions with you. Any such notes will be kept 100% confidential and not be shared with any third party.

We require all our third-party suppliers to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Third Party Links**

Our website, <u>www.beconnectedcoaching.co.uk</u> may include links to other third-party websites. Clicking on those links will allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### Where your data will be located

We will not transfer your data outside the UK. However, some of our external third parties may use servers outside the European Economic Area (EEA) so their processing of your personal data may involve a transfer of



data outside the EEA. This applies to standard services with reputable suppliers such as Microsoft and Google. Whenever your personal data is transferred out of the EEA, these third parties will ensure a similar degree of protection is afforded to it in compliance with UK/EU data protection laws.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us via email at *beth@beconnectedcoaching.co.uk* or via post at Be Connected Coaching Limited, Suite 37, 264 Lavender Hill London SW11 1LJ.

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:

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

Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>.

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