

Privacy Notice

This is the Privacy Notice for **Anne Webber**, trading as

Anne Webber, Change Agent, Executive Coach and Supervisor and as

Living on Purpose Ltd

Contact Details:

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0845 644 2369

1.

A Commitment to Your Privacy

In line with the new regulations from the European Union, I set out in my privacy notice in compliance with the **General Data Protection Regulation (GDPR)**.

This regulation replaces previous directives for data protection and comes into effect from the 25th May 2018. It is designed to enhance the privacy of every individual, stating that personal data should be 'processed fairly and lawfully' and 'collected for specified, explicit and legitimate purposes'.

And it is in this spirit that I carefully consider the data I collect and handle it with respect. I am committed to ensuring that your personal information is protected and not misused.

At any time, you can change your preferences and 'opt in' or 'opt out' of receiving communications from me including marketing offers and updates. Simply contact me by email: awebber@livingonpurpose.co.uk

2.

This Policy is set out in Two Sections

(a) **Your Personal data** – the type of personal information I collect, why I do so, when, how it is used, the control you have over your personal data and the procedures I go through to protect it. It applies to information that is collected by phone, email, skype/zoom, contact forms, referrals and in person.

(b) **Your Rights** – the ways that you can control what happens to your data.

2 (a)

About your Personal Data

When you make an enquiry about my services

The name and contact details you give and the content of your message(s) are retained for three reasons:

- By your **consent**
- As part of a **'contract'** (only while we communicate)
- For **legitimate business interests** – for good business practice I keep a record of who has made contact before, the types of enquiries made and interests expressed.

If you decide not to go ahead with any coaching or supervision sessions following enquiry, these details are then securely shredded/deleted, unless you give your consent to be informed/updated of services in the future.

When you work with me for coaching or supervision

This is a contract for services. Your contact details are dealt with as above (consent, contract, and legitimate interests). Also, your payment details e.g. by electronic means, are retained for six years beyond the end of the contract for legal reasons i.e. UK Accounting Law.

I also keep a record of your attendance, on the legal bases of both contract and legitimate interest – so that I can send you updates or offers which may be of specific interest to you as a client – and for us to exchange general progress updates.

As part of our work together, you may wish (or need) to provide personal details of a **sensitive nature**.

As a **'Coaching or Supervision Agreement'** these will be retained in printed and/or handwritten format and include your name, signature and agreed schedule for our sessions.

As a **'Client Info Sheet/Practical Info Sheet'** these will be retained in printed and/or handwritten format and include some/all of the following: your contact details, employment details, emergency contact, anything our would like me to know, e.g. medical conditions, significant dates/events, how you found me and willingness to write a recommendation. The sensitive nature of such documents will generally be in relation to health, medical history, your lived experiences and/or information that you would like me to know before we start our work together.

As '**Session Notes**' these are memos usually handwritten by me for the purpose of fulfilling our contract and keeping tabs on the work during the session and from one week to the next.

All of your information is held and filed securely. In the event that records need to be transported for a home visit or to another practitioner for referral for example, reasonable care and attention will be given to transport them securely.

In all cases I am required by law to retain these records for at least **seven years** after the completion of our contract. In some cases, it may be appropriate to hold records indefinitely based on legitimate business interests, including the possibility of future work together and in the event that the notes will secure potential evidence for a criminal prosecution, civil litigation, insurance claim or complaint. In any of these cases, I will need to keep your personal data to refer to.

Other data sources

Incoming data can also be received from **Skype or Zoom (or other similar media)**.

I may receive information from another coach or supervisor as part of a **referral**. In such a case you may be unaware that the consented data transfer has taken place, so I will therefore aim to inform you of receipt within 28 days.

Sharing your data

Your privacy is important and I do not sell your data nor share it except by your **consent** or under the law.

When working together, I may give out elements of your personal information to another coach or supervisor as part of a **referral**. This will only ever be with your personal **written consent**.

In continuation of current UK law on confidentiality, I also retain the right, and in some cases, the legal obligation, to breach confidentiality in order to inform regulatory bodies, law enforcement authorities or your GP of impending harm or illegality to you and others including children.

In the event of a complaint or insurance claim being brought against me I will share your personal data with my professional body: European Mentoring & Coaching Council (EMCC), my Supervisor and/or my Insurance Company. In the event of any investigation or legal proceedings being brought against me, I will share personal data with my Solicitor.

2 (b)

About Your Rights

The **GDPR** sets out clearly what your rights are. It also lays out timelines for a reply.

Right to be informed

You have the right to be informed about the collection and use of your personal data. This is a key transparency requirement under the GDPR, and it is the purpose of this Privacy Notice.

I must provide you with information including: my purposes for processing your personal data, my retention periods for that personal data, and who it will be shared with. This 'privacy information' is already provided above.

I must provide you with privacy information at the time I collect your personal data from you.

If I obtain your personal data from other sources, e.g. by referral or from the payment service provider you selected, I must provide you with privacy information within a reasonable period of obtaining the data and I aim to provide it within one month.

There are a few circumstances when I do not need to provide people with privacy information, such as if an individual already has the information or if it would involve a disproportionate effort to provide it.

In the unlikely event of a security breach which compromises the protection of your personal information and I need to let you know about it, I will do so.

The information I provide to people must be concise, transparent, intelligible, easily accessible, and it must use clear and plain language. Therefore if there is anything you do not understand, please get in touch.

Right of access

You have the right to access your personal data and supplementary information. This allows you to be aware of and verify the lawfulness of the processing.

You are entitled to confirmation that your data is being processed (used), access to your personal data and other supplementary information as provided in this privacy notice.

Right to rectification

You have the right to have the data your personal data corrected if it is incorrect, or completed if it is incomplete. If I believe that information is inaccurate I will record the fact that the accuracy of the information is disputed.

Right to erasure

You may request, verbally or in writing, to have your data erased. This is also commonly known as ‘the right to be forgotten’. This right only takes effect when:

- your personal data is no longer necessary for the purpose for which it was originally collected or processed
- you withdraw your consent when the sole legal basis to hold this information is your consent
- there is a legitimate interest in processing this data, which does not override your request
- processing of the personal data was for direct marketing purposes and this is the use you object to
- your personal data was processed unlawfully without a proper legal basis
- there is a legal obligation to comply with your request

Right to restrict processing

You have the right to request the restriction or suppression of your personal data. In other words you want to stop the data being used but want it kept on file.

In this case your personal data cannot be used and can only be stored unless:

- you give your consent;
- it is for the establishment, exercise or defence of legal claims;
- it is for the protection of the rights of another person (natural or legal); or
- it is for reasons of important public interest.

Right to data portability

This allows you to obtain and reuse your personal data for your own purposes across different services. The right also only applies to information you have provided.

If, as a private client you wish to carry a copy of your case notes or other sensitive data to another practitioner or other mental, physical or spiritual health service, these may be provided to you or to the nominated service provider, on request, by the most secure electronic means I have available or via secure post.

Right to object

Individuals have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

Your objection must be made on grounds relating to your particular situation.

Once you object your data can no longer be processed, unless:

- there are demonstrably compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- the processing is for the establishment, exercise or defence of legal claims.

To exercise all relevant rights, queries or complaints, please in the first instance, contact me via:

- awebber@livingonpurpose.co.uk

If you find the outcome unsatisfactory, you are then able to object or complain to:

- Information Commissioner's Office on: 0303 123 1113 or via email: <https://ico.org.uk/global/contact-us/email> or by post at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
- My Professional Body: EMCC International, P O Box 3154, Marlborough, Wiltshire, SN8 3WD or via email: EMCC.Administrator@emccouncil.org.
- My Insurers: Towergate Insurance, Towergate House, Eclipse Park, Sittingbourne Road, Maidstone, Kent, ME14 3EN.

You may of course also exercise your right to legal action.

Timelines

You can claim a right verbally or in writing.

A response should come without delay and at least within one month of receipt. The time limit is calculated from the day after you make the request (whether the day after is a working day or not) until the corresponding calendar date in the next month.

I aim to respond within 28 days.

Exceptions

When you request access to your data, a copy must be provided free of charge. However, you will be charged a 'reasonable fee' when a request is:

- manifestly unfounded or excessive, particularly if it is repetitive, unless the reason for this is that I failed to respond; or
- for further copies of the same information (that has previously been provided).

Further Processing

If I wish to use your personal data for a new purpose, not covered by this Privacy Notice, then I will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, I will seek your prior consent to the new processing.

Final Word

This information is designed to help you understand how your data is collected, used and stored. I trust you feel reassured by the systems in place.