**Taylored Coaching & Consulting Ltd - Privacy Notice**

We (Taylored Coaching & Consulting Ltd trading as “Taylored Coaching”) are committed to protecting the privacy and security of your personal information.

Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data, we are regulated under the UK General Data Protection Regulation (“**GDPR**”) and the Data Protection Act 2018. We are responsible as ‘controller’ of that personal data for the purposes of data protection legislation.

This privacy notice applies to any individual whose data we process, including (but not limited to) visitors to our website, professional contacts, Clients, and Coaching Counterparts (please see definitions below).

We may change this notice by updating this page and you should check this page from time to time to ensure that you are happy with any changes. This policy was last updated in February 2021.

**Key terms**

|  |  |
| --- | --- |
| **We, us, our, Taylored Coaching** | Taylored Coaching & Consulting Ltd (CRN: 13065766) (trading as “Taylored Coaching”), a private company limited by shares whose registered office is at 27 Old Gloucester Street, London WC1N 3AX |
| **Our point of contact** |  | **Louise Taylor Walls*** louise@tayloredcoaching.com
* 27 Old Gloucester Street, London WC1N 3AX
* <https://www.tayloredcoaching.com/>
* +44 (0) 7307 908 293
 |
| **Personal data / information** |  | Any information about an individual from which that person can be identified |
| **Sensitive personal data / information** |  | Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data, data concerning health, sexual orientation, or details of criminal offences |
| **Client** |  | The individual or organisation that engages us to deliver coaching services to the Coaching Counterpart  |
| **Coaching Counterpart(s)** |  | The individual or group of individuals to which we deliver coaching services |

**We *may* collect the following personal information about you:**

* **“Identity Data”** - includes name, title, date of birth and gender.
* **“Contact Data”** - includes address, email address and telephone numbers.
* **“Financial Data”** - includes bank account and payment card details (to process payments).
* **“Transaction Data”** - includes details about payments from you and other details of services and sessions you have purchased.
* **“Technical Data”** - includes internet protocol (IP) address, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
* **“Profile Data”** includes notes from coaching sessions, assessment tools, feedback surveys, testimonials etc.
* **“Usage Data”** - includes information about how you use our website and services.
* **“Marketing and Communications Data”** - includes your preferences in receiving marketing from us and your communication preferences.

The personal information we collect about you will depend on our relationship with you, e.g. whether you are a Client, a Coaching Counterpart, a visitor to our website, a professional connection etc. We only collect personal information about you where it is both lawful and necessary.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

**We *may* collect *sensitive* personal information about you**

If you are an individual Client to whom we deliver coaching sessions or a Coaching Counterpart, we may collect sensitive personal information about you. We will only collect such sensitive personal information as you provide to us during coaching sessions and only with your explicit consent and knowledge. Please see above for a definition of what constitutes “sensitive personal data”.

We only collect and store such sensitive personal information where it is necessary and lawful to do so, and only insofar as you impart such information to us and such information is necessary for the effective delivery of the coaching sessions. Your sensitive personal data shall be stored in the notes taken during the coaching sessions, which shall be stored securely (as set out below) on our internal computer systems, which are password-protected (whether by pin or fingerprint authentication).

We are committed to protecting and preserving the confidentiality of this information.

**Information about other people**

Should you provide information to us about any person other than yourself, including (but not limited to) a Coaching Counterpart, your employees, advisers, or counterparties you must ensure that such third parties have been informed and understand how their personal data will be used and/or that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

Our website is not intended for children and we do not knowingly collect data relating to children.

**How your personal information is collected**

We collect most of this personal information directly from you or your organisation - in person, by telephone, text or email and/or via our website. However, we may also collect information:

* from publicly accessible sources;
* from a third party, e.g. your employer, other entities or individuals providing services to you, our professional contacts etc.; and
* via our IT systems, e.g. automated monitoring of our technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

# How and why we use your personal information

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

* where we need to perform the contract we are about to enter into or have entered into with you;
* where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
* where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your non-sensitive personal data (but please see “**Promotional Communications**” below).

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

|  |  |
| --- | --- |
| **Purpose/Activity** | **Lawful basis for processing including basis of legitimate interest** |
| To register you as a new Client or Counterparty. | Performance of a contract with you |
| To provide services to, and fulfil our contract with, you. | Performance of a contract with you |
| To administer our relationship with you, including processing payments, accounting, compliance checks, and taking other steps linked to the performance of our relationship. | 1. Performance of a contract with you
2. Necessary to comply with a legal obligation
3. Necessary for our legitimate interests (to take payment, keep our records updated, effectively deliver coaching sessions and effectively run our business)
 |
| To comply with ongoing coaching accreditation requirements (International Coaching Federation and such other regulatory bodies we register with from time to time). | 1. Necessary to comply with a legal obligation
2. Necessary for our legitimate interests (to obtain and maintain accreditations to enhance our professional reputation and access to support and materials)
 |
| To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | 1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)
2. Necessary to comply with a legal obligation
 |
| To deliver relevant website content to you and measure or understand the effectiveness of the advertising we serve to you | Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, client relationships and experiences | Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |
| To send promotional communications to existing clients and publish anonymous testimonials | Necessary for our legitimate interests (to develop our business and market similar services to existing clients) |

Please note a legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. When relying on this legal basis, we undertake an assessment of whether our business or commercial reasons are outweighed by your rights and interests.

# Promotional communications

We may use your personal data to send you updates (by email, telephone or post) about our services that might be of interest to you.

We have a legitimate interest in processing your personal data for promotional purposes (see above ‘**How and why we use your personal data**’). Where you are an existing Client and/or Coaching Counterpart, we rely on the “soft opt-in” exception in order to send you promotional communications about similar services we offer. However, where consent is needed, we will ask for this consent separately and clearly.

You have the right to opt out of receiving promotional communications at any time or to update your marketing preferences by:

* contacting us by e-mailing coaching@tayloredcoaching.com; or
* using the ‘**unsubscribe**’ link in emails.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

**How long we keep your data for**

We will keep your personal data for no longer than is necessary for the purpose(s) it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

We keep your data for the minimum period we consider necessary to resolve any queries and to ensure legal and regulatory compliance and in line with industry practice.

Further details of the periods for which we retain data are available on request.

**Who we share your personal information with**

We may share your personal information with third parties, but only where this is necessary and lawful.

**Professional advisers**

We may share your personal data with our professional advisers, including our lawyers, accountants and insurers.

**Third party providers**We may be required to share basic user information with our third-party service providers, such as our website developer, IT support, third party payment processor.

**Regulatory and accreditation bodies**

Where necessary, we may share limited Contact Data and logged coaching hours with accreditation bodies (such as the International Coaching Federation and such other regulatory bodies we register with from time to time) in order to maintain our professional accreditations.

Certain regulatory and accreditation bodes have head offices outside of the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by only transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data. Please contact us if you want further information on transferring your personal data out of the UK.

**Your employer**

Where you are a Coaching Counterpart, we may share with your employer (where the employer is the Client) whether you are attending coaching sessions and are actively engaged and participating in such sessions, but we shall not share the content of any such coaching sessions with your employer unless you are present and have specifically requested that we share such information.

We require all third parties 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.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

**Where your personal information is held**

Information is stored securely on our internal computer systems (please see below for more details on our security measures), and with third party agencies, service providers, and advisers as described above (see above: ‘**Who we share your personal information with’**).

# Your rights

You have the following rights, which you can ordinarily exercise free of charge:

|  |  |
| --- | --- |
| **Access** | The right to be provided with a copy of your personal data |
| **Rectification** | The right to require us to correct any mistakes in your personal data |
| **To be forgotten** | The right to require us to delete your personal data - in certain situations |
| **Restriction of processing** | The right to require us to restrict processing of your personal data - in certain circumstances e.g. if you contest the accuracy of the data |
| **Data portability** | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party |
| **To object** | The right to object:* at any time to your personal data being processed for direct marketing; and
* in certain other situations to our continued processing of your personal data e.g. processing carried out for the purpose of our legitimate interests.
 |

If you would like to exercise any of those rights, please:

* email, call or write to us - see below: ‘**How to contact us**’; and
* let us have enough information to identify you (e.g. your full name, address and client or matter reference number);
* if relevant, let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
* let us know what right you want to exercise and the information to which your request relates.

**Maintenance and security of your personal information**

We are committed to ensuring that your information is secure. We endeavour to ensure that your data is stored securely and to prevent unauthorised access. We have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online, which we monitor regularly. All information is stored securely on internal computer systems, password-protected (whether by pin or fingerprint authentication), with McAfee LiveSafe software installed allowing real-time scanning and firewall protection against hackers, viruses etc. All paperwork is shredded in a timely manner.

We limit access to your personal information to those individuals who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

# Right to withdraw consent

If you have provided your consent to the processing of your personal and/or sensitive personal data, you have the right to withdraw your consent. If you wish to do so, please contact us.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**Updating your personal information**

We are committed to maintaining the accuracy of the personal data we process. If any of the personal data that you have provided to us changes or if you become aware that we are processing inaccurate personal data about you, please get in touch. We will not be responsible for any losses arising from any inaccurate or incomplete personal data provided to us by you.

**Links to other websites**

# Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. We cannot therefore be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy notice. You should exercise caution and look at the privacy notices applicable to the website in question.How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

Data protection legislation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at [https://ico.org.uk/concerns](http://ico.org.uk/concerns/) or by telephone on 0303 123 1113.

# How to contact us

Please contact usby post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

**Our contact details**

* **Taylored Coaching & Consulting Ltd (trading as “Taylored Coaching”)**
* **louise@tayloredcoaching.com**
* **27 Old Gloucester Street, London WC1N 3AX**
* [**https://www.tayloredcoaching.com/**](https://www.tayloredcoaching.com/)
* **+44 (0) 7307 908 293**