



## **Data Privacy Policy**

Last updated 17 May 2018

### **Introduction**

Coaching4Careers (along with most businesses) needs to collect and use personal information about individuals. This can include clients, prospective clients, partners, associates, suppliers and any other individuals that the organisation has a relationship with; or may need to contact.

This policy describes how this information is collected, handled and stored to meet our company data protection standards and to comply with legal requirements.

Data protection regulations have existed for many years to safeguard an individual's data. On 25<sup>th</sup> May 2018 enhanced rules come into force known as General Data Protection Regulations (GDPR).

### **Why this policy exists:**

This policy exists to ensure that Coaching4Careers

- Is open and transparent about how data is collected, stored and processed
- Complies with GDPR legislation and good practice
- Protects the rights of those individuals
- Has the correct procedures in place to detect, report and investigate a personal data breach.

### **General Data Protection Regulations (GDPR)**

GDPR comes into effect on 25<sup>th</sup> May 2018 and affects all businesses operating in the EU. GDPR details how organisations must operate when collecting, storing and processing personal data. Being transparent and providing accessible information to individuals about how their personal data will be used is a key element of the Data Protection Act 1998 (DPA) and the EU General Data Protection Regulation (GDPR); and this policy describes how Coaching4Careers will meet these requirements.



## Lawful Basis

According to GDPR there must be a lawful basis for collecting and processing an individual's personal data. The following bases are defined within GDPR (Article 6):

- Consent
- Contract
- Legal Obligation
- Vital Interests
- Public Task
- Legitimate Interests

Within Coaching4Careers the relevant bases for collecting and processing personal data will be Consent and Contract.

**Consent:** where the individual has given clear consent for Coaching4Careers to process their personal data for a specific purpose.

**Contract:** where the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

## What information is being collected?

Coaching4Careers will only collect the data required to provide the services you have enquired about or have contracted with us; for example name, address, telephone number(s), email address. Additional information relating to you and your career or personal status may be collected during coaching sessions; over the phone or face to face; within an email exchange; or whilst using our online resources (Abintegro).

## Who is collecting it?

Coaching4Careers coaches, our administrators, and our listed Associates will capture personal information prior to setting up a coaching session; C4C Coaches and Associate Coaches will collect personal information during coaching sessions. Whilst using the online resources additional information may be collected, this is subject to Abintegro's Data Privacy Policy which is available via the Online Resources, or direct from Abintegro.



## **How and why is it being collected?**

All personal data collected is captured under the GDPR basis of Contract in order for Coaching4Careers to provide the services that an individual has purchased or is enquiring about.

Information will be collected via email, response forms or website enquiries, as well as during our Health Check process over the phone and during coaching sessions.

Additionally if you have given your consent we may use your personal data in order to send you our newsletter or information related to coaching and careers that we think you will find relevant and useful. You have the right to withdraw your consent at any time, either by email or letter.

These are the only reasons personal information will be collected and used.

## **Who will it be shared with?**

Personal data collected by C4C will be shared with C4C staff. It may also be shared with selected Coaching4Careers' Associates in order for an Associate to deliver the services required. All Associates have also agreed to keep any client information confidential.

If you have signed up to use our Online Resources, then some personal details will be shared with Abintegro to provide these services. Abintegro have their own Privacy Data Policy which you will have been asked to agree to when signing into the Resources. This is available for review should you wish to read it.

Coaching4Careers will never pass on any of your details to a third party organisation without your express consent.

## **How and for how long will it be stored?**

Personal information will be kept for the duration of the working relationship; and a further 7 years as required to comply with legal obligations. Information will be securely stored online; and any paperwork will be stored such that it is only accessible to C4C staff; and / or the specific C4C Associate Coach.

## **Right to update details or withdraw Consent**

If any personal details change then it is the responsibility of the individual to inform Coaching4Careers of any changes. If an individual no longer wishes to be contacted by Coaching4Careers they may inform C4C, in writing, at any time.

Coaching4Careers will undertake to implement such requests as quickly as practically possible.