



## Therapeutic Coaching Consultancy (TCC) Privacy Policy

Your privacy is very important to TCC and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to us. We adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what we will do with your personal information from initial point of contact through to after your therapeutic coaching/training/development service has ended, including:

- Why we are able to process your information and what purpose we are processing it for
- Whether you have to provide it to us
- How long we store it for
- Whether there are other recipients of your personal information
- Whether we intend to transfer it to another country,
- Whether we do automated decision-making or profiling, and
- Your data protection rights.

'Data controller' is the term used to describe the person/organisation that collects and stores and has responsibility for people's personal data. In this instance, the data controller is Lucy Myers (TCC Founder and CEO), who is registered with the Information Commissioner's Office reference ZB032130. TCC contact details are as follows:

Name: Therapeutic Coaching Consultancy Ltd (TCC)

Registered business address: 328 Chatsworth Avenue, Portsmouth, Hampshire, PO6 2U

E-mail: [info@therapeuticcoachingconsultancy.co.uk](mailto:info@therapeuticcoachingconsultancy.co.uk)

The GDPR states that we must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which we are processing your data, explained as below:

- If you have had therapeutic coaching, training or development services which have now ended, we will use legitimate interest as the lawful basis for holding and using your personal information.
- If you are currently having therapeutic coaching services or if you are in contact with us to consider using TCC services, we will process your personal data where it is necessary for the performance of our contract.
- The GDPR also makes sure that we look after any sensitive personal information that you may disclose to us appropriately. This type of information is called 'special category personal information'. The lawful basis for processing any special categories

of personal information is that it is for provision of health treatment (in this case therapeutic coaching) and necessary for a contract with a health professional (in this case, a contract between us and TCC).

### **How we use your information**

When you contact us with an enquiry about our services, we will collect information to help us satisfy your enquiry. This will include names, email and telephone number. Alternatively, your GP or other health professional or organisation may send us your details when making a referral or a parent or trusted individual may give us your details when making an enquiry on your behalf. If you decide not to proceed, we will ensure all your personal data is deleted within 90 days. If you would like us to delete this information sooner, just let us know.

While you are accessing therapeutic coaching services rest assured that everything you discuss with us is confidential. That confidentiality will only be broken if we consider there to be risk of harm to yourself or another person or related to fraud or drug trafficking. We will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

We will keep a record of your personal details to help the therapeutic coaching services run smoothly. These details are kept securely either online with password protection and security software or in a locked filing cabinet and are not shared with any third party. We will keep very brief written notes of each session, these are kept in a locked cabinet in a locked and alarmed room. For security reasons we do not retain text messages for more than 1 month. Likewise, any email correspondence will be deleted after 1 month if it is not important. If necessary, we will transfer it to your file.

### **After therapeutic coaching services have ended**

Once therapeutic coaching services have ended the records will be kept for two years from the end of the contract and then securely destroyed. If you want us to delete the information sooner than this, please tell us.

### **Third party recipients of personal data**

We sometimes share personal data with third parties, for example, where we have contracted with a supplier to carry out specific tasks. In such cases we have carefully selected which partners we work with. We take great care to ensure that we have a contract with the third party that states what they are allowed to do with the data we share with them. We ensure that they do not use your information in any way other than the task for which they have been contracted.

### **Privacy notice guide - Your rights**

We try to be as open as we can be in terms of giving people access to their personal information. You have a right to ask us to delete your personal information, to limit how we use your personal information, or to stop processing your personal information. You also

have a right to ask for a copy of any information that we hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at [ico.org.uk/your-data-matters](https://ico.org.uk/your-data-matters).

If we do hold information about you we will:

- give you a description of it and where it came from;
- tell you why we are holding it, tell you how long we will store your data and how we made this decision;
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form.

You can also ask us at any time to correct any mistakes there may be in the personal information we hold about you.

To make a request for any personal information we may hold about you, please put the request in writing addressing it to [info@therapeuticcoachingconsultancy.co.uk](mailto:info@therapeuticcoachingconsultancy.co.uk).

### **How to complain**

If you have any complaint about how we handle your personal data please do not hesitate to get in touch with us by writing or emailing to the contact details given above. We would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way we have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint), or their address is:

Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113 ICO  
Website: [www.ico.org.uk](https://www.ico.org.uk)

### **Data security**

We take the security of the data we hold about you very seriously and as such we take every effort to make sure it is kept secure. We use laptops with password protection and security protection. Any paper files are stored in locked filing cabinets in locked rooms.

### **Visitors to our website**

When someone visits TCC's website, we use a third-party service who collect standard internet log information and details of visitor behaviour patterns. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Wix to make, any attempt to find out the identities of those visiting our website. We use legitimate interests as our lawful basis for holding and using your personal information in this way

when you visit TCC's website. Please see Wix's website for further information on how they manage users of their software.

## Cookies

The site uses cookies to distinguish you from other users of the site. This helps us to provide you with a good experience when you browse the site and allows us to improve the site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. We use the following cookies:

- **Strictly necessary/essential cookies.** These are cookies that are required for the operation of the Site. They include, by way of general example, cookies that enable you to log into secure areas of the Site, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around the Site when they are using it. This helps us to improve the way the Site works by, for example, ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to the Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to the site, the pages you have visited and the links you have followed. We will use this information to make the site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.