

# Privacy Policy

## 1. Introduction

This policy explains how personal data is collected, used, stored and protected in the course of my coaching practice. I am committed to processing personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. For the purpose of data protection legislation, I act as the data controller in relation to any personal data you provide.

## 2. Personal Data Collected

The types of personal data that may be collected include:

- Name and contact details (e.g. email address, telephone number)
- Professional information relevant to coaching
- Coaching session notes and agreed goals
- Signed agreements and consent forms
- Session recordings (where explicit consent has been provided)

I do not intentionally collect special category data unless it is voluntarily shared and directly relevant to coaching.

## 3. Lawful Basis for Processing

Personal data is processed under the following lawful bases:

- **Consent:** Where you provide explicit consent (e.g. for recording sessions)
- **Legitimate interest:** For the provision and administration of coaching services
- **Legal obligation:** Where required to comply with legal or safeguarding duties

You may withdraw consent at any time where consent is the lawful basis.

## 4. How Your Data Is Used

Personal data is used solely for:

- Delivering coaching services
- Managing appointments and communication
- Maintaining session records

- Fulfilling apprenticeship assessment requirements (in anonymised form only)
- Complying with safeguarding or legal obligations

Your data will never be sold, shared for marketing purposes, or disclosed to third parties without lawful basis.

## **5. Data Storage and Security**

All personal data is stored securely within an encrypted iCloud account. Access is restricted solely to me in my role as coach. Appropriate technical and organisational measures are in place to protect against unauthorised access, loss, misuse or disclosure. Where coaching evidence is shared with authorised assessors for apprenticeship assessment purposes, all materials are fully anonymised to remove identifying information.

## **6. Data Retention**

Personal data is retained only for as long as necessary to fulfil coaching and apprenticeship assessment requirements. Data will be securely deleted once it is no longer required.

## **7. Confidentiality and Limits**

Coaching sessions are confidential. However, confidentiality may be limited where:

- There is risk of serious harm to the coachee or others
- There is disclosure of illegal activity
- Disclosure is required by law

Any necessary disclosure would be proportionate and, where possible, discussed with the coachee in advance.

## **8. Your Rights**

Under UK GDPR, you have the right to:

- Request access to your personal data
- Request correction of inaccurate data
- Request erasure of your data (where applicable)
- Restrict or object to processing in certain circumstances
- Withdraw consent where consent is relied upon

Requests can be made in writing and will be responded to in accordance with statutory timeframes.

## **9. Contact**

If you have any questions regarding this policy or how your data is handled, please contact:

Yasmine Saito  
[ys.coaching@outlook.com](mailto:ys.coaching@outlook.com)

If you are not satisfied with the response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) in the UK.

*Yasmine Saito  
Level 5 Coaching Professional  
BPP  
University of Oxford*