



GDPR – PRIVACY NOTICE

Data Controller: Nichola Pyrkos
Telephone: 07940517758
Email: mindfullifecoachuk@gmail.com
www.themindfullifecoachuk.com

In accordance with the General Data Protection Requirements (GDPR) and the Data Protection Act's (DPA) 8 key principles

Data processing is defined by the Information Commissioners Office (ICO) as:

- Obtaining
- Recording
- Storing
- Updating
- Sharing

1. Personal data must be processed fairly and lawfully

Personal data collected by The Mindful Life Coach UK is the client's:

- Name
- Telephone number
- Email address
- Address
- Health Declaration
- Notes from sessions

Data is collected from clients by email, phone or messaging. This is collected at first point of contact for the purpose of communications and booking coaching sessions. Data may be updated as necessary thereafter e.g. if the Client would like to add another form of contact.

Notes from sessions are made to facilitate subsequent sessions.

Client data will not be shared, or passed on to, any third parties (except anonymised data to HMRC for taxation purposes only).

2. Personal data must be processed for specified lawful purposes

Consent for data to be collected is requested under the General Data Protection Requirement's (GDPR) Contract basis. This is so that The Mindful Life Coach UK can undertake a necessary basis of:

- Fulfilling a contractual obligation to clients
- Providing quotes prior to commencement of coaching sessions

- Communicating and booking coaching sessions
- Making notes during sessions to facilitate subsequent sessions.

Necessary basis - Data is collected at first point of contact, and may be updated as necessary thereafter e.g. if the client would like to add another form of contact such WhatsApp/Viber.

Data collected will be used for no other purpose than to: contact clients; facilitate sessions; report income to HMRC.

3. Personal data must be adequate, relevant and not excessive

The data collected is the minimum necessary to enable contact for bookings and facilitation of sessions.

4. Personal data must be accurate and up to date

Data is collected directly from the clients. Clients are able to ask for amendments to be made at any time. Amendments will be made within 48 hours of receipt of requests.

5. Personal data must not be kept for any longer than is necessary

Clients' data shall be held for 7 years in accordance with insurance policy and so that re-engagements can be easily made if the client wishes.

If a client requests their data to be deleted prior to this, requests will be looked into within one month of request being received.

6. Personal data must be processed in accordance with the rights of individuals

Right to be informed

Individuals have the right to be informed about the collection and use of their personal data. This privacy notice sets out the purposes for processing personal data, retention periods for that personal data, and who it will be shared with. This privacy information will be provided to individuals within one week of personal data being collected.

Right of Access

Individuals have the right to access a copy of their personal data as well as other supplementary information. Individuals can make an access request to The Mindful Life Coach UK verbally or in writing. These will be responded to within one month of receipt of request. There will be no fee for dealing with these requests.

Right of Rectification

Individuals have the right to have inaccurate personal data rectified or completed if it is incomplete. An individual can make a request for rectification verbally or in writing. These will be responded to within one month of receipt of request.

Right to Erasure

Individuals to have personal data erased, also known as 'the right to be forgotten'. Individuals can make a request for erasure verbally or in writing. These will be responded to within one month of receipt of request.

- Contact details will be deleted
- Case notes will be shredded
- Anonymised log of payments kept for HMRC

Right to Restrict Processing

Individuals have the right to request the restriction or suppression of their personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, The Mindful Life coach is permitted to store the personal data, but not use it. An individual can make a request for restriction verbally or in writing. These will be responded to within one month of receipt of request.

Right to Data Portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

Doing this enables individuals to take advantage of applications and services that can use this data to find them a better deal or help them understand their spending habits.

The right only applies to information an individual has provided to a controller.

Right to Object

Individuals have the right to object to the processing of their personal data in certain circumstances.

Individuals have an absolute right to stop their data being used for direct marketing.

Individuals can make an objection verbally or in writing.

Objections will be responded to within one calendar month of receipt of objection.

For all rights, The Mindful Life Coach UK can refuse or charge for requests that are manifestly unfounded, or excessive. If The Mindful Life Coach refuses a request, they must tell the client why and that they have the right to complain to the supervisory authority and to a judicial remedy.

7. Personal data must be kept secure

All personal data is kept in password protected files, backed up on a password protected memory stick, which is kept locked away when not in use.

Case notes are stored safely on a password protected Laptop which is also locked away when not in use in a cupboard.

Clients have the right to be informed of any personal data breaches. This shall be done within 72 hours and will be recorded.

8. Personal data must not be transferred outside the European Economic Area without adequate protection

Not applicable.

Complaints

The Mindful Life Coach UK has been deemed as having no requirement to register with the Information Commissioners Office (ICO) "You are only processing personal data for the core business purposes. You therefore do not have to register with the ICO".

However, clients have a right to complain to the ICO if they think there is a problem with the way The Mindful Life Coach is handling their data.

<https://ico.org.uk/make-a-complaint/>