

Oxford Learning Curve

Privacy Notice for Coaching

Jackie Fairchild is the sole director of Oxford Learning Curve Ltd. (OLC) which provides tutoring and career coaching. This privacy notice explains how OLC conforms to the General Data Protection Regulation (GDPR), implemented on 25 May 2018 in EU law on data protection which is enforced by the Information Commissioner's Office (ICO).

Providing an engaging and personal coaching environment is of utmost importance to OLC, and we likewise place the highest priority on the protection of your personal data. OLC wishes, therefore, to be fully transparent about the data we hold, the reasons for requiring such information, the arrangements in place to ensure it is protected and how it will be securely deleted when no longer required.

Consequently, we shall:

- Only ask you for relevant information.
- Never share or retain the information for longer than required.
- Uphold our duty to accuracy and the safe storage of your information.
- Comply with your rights to access information held about you.
- Respect your right to withdraw your consent at any time.

Contents

What is Personal Data?

Special Category Data

Data We Collect

How We Collect, Use and Store Your Data

Your Data Protection Rights

Our Lawful Basis

The OLC Website and the Use of Cookies

Contact Us

Contacting the Appropriate Authorities

What is Personal Data?

Personal data is defined as any information that relates to an identified or identifiable individual. If an individual can be identified directly from a piece of information, it is likely that this will be classed as *personal data*.

Examples of personal data include:

- Name
- Home address
- Email address
- Mobile or home phone number
- Credit/debit card details
- Cookie identifiers (please see the section: 'What are Cookies?')

Special Category Data

Special category data is personal data which is considered to be more sensitive, and is, therefore, under stricter regulation. More information about the specifics of what special category data entails can be found at the following address: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

Data We Collect

OLC may collect and store some or all of the following examples of personal data, with your explicit consent:

- Name of the client
- Home address
- Email address
- Mobile and/or home phone number
- Session notes

During a coaching session, *session notes* may be recorded which contain brief information from the session and serve merely as an 'aide memoire'. All session notes are hand-written and are coded so that they cannot be traced to the individual. OLC **may store and handle special category data** with *explicit consent* if the client decides to disclose this information during coaching sessions and therefore feels it is important and relevant.

How We Collect, Use and Store Your Data

All the personal data we collect is obtained straight from you when you contact OLC via either email, phone, the website contact form, or during a coaching session in the form of session notes. This data is used purely for either contacting clients directly to arrange and attend appointments, improving the coaching experience and for accounting purposes.

Electronic Information

OLC has many processes in place to ensure secure protection for all electronically stored personal data:

- Electronically stored data may include your name, home address, email address and mobile number.
- All computers are password protected.
- Electronic devices used for communication purposes are password protected.
- All computers have up-to-date anti-malware software.
- A valid SSL certificate is used on the website to encrypt all personal data entered into the contact form.
- Your data is not shared with any other organisations or individuals outside of OLC.

Session Notes

Session notes are hand-written and stored in a lockable cabinet. These contain brief information from a session and serve merely as an 'aide memoire'.

How Long is it Stored For?

Your personal data will be stored for up to four years after coaching has ended to permit the appropriate follow-up of any outstanding issues and to ensure

continuity, should further coaching sessions be required. When no longer required, all records will be permanently deleted or securely shredded.

Data Breaches

In the case of a data breach, OLC will also take immediate action to determine whether it is necessary to inform the ICO and affected individuals, done by assessing whether it is likely to pose a risk or threat to the rights, freedom and privacy of those involved.

Your Data Protection Rights

OLC would like to ensure all clients and visitors to the website are fully aware of their data protection rights, which are outlined below:

- The right to be informed about the collection and use of personal data.
- The right to access stored personal data.
- The right to rectification of inaccurate or incomplete personal data.
- The right to erasure of personal data.
- The right to the restriction or suppression of handling personal data.
- The right to data portability, allowing individuals to obtain and reuse personal data for their own purposes.
- The right to object to the handling of personal data.
- Rights in relation to automated decision making and profiling.
- The right to withdraw consent.

Requests to address any of these rights should be made in writing via email to OLC and will be dealt with free of charge and within one month of the request, if not sooner.

The Right to Be Informed

You have the right to be informed of every occasion in which personal data is collected. OLC will inform you and ask for consent before collecting and/or storing any personal data.

The Right to Access

You have the right to access all your stored personal data via a *subject access request*.

The Right to Rectification

You have the right to rectify any incorrect or incomplete personal data.

The Right to Erasure

You have the right to have your personal data erased, also known as the 'right to be forgotten'.

The Right to Restrict Handling Data

You have the right to restrict the use and storage of personal data.

The Right to Data Portability

You have the right to obtain and reuse your personal data for your own purposes across multiple services online.

The Right to Object

You have the right to object to the collection and storage of personal data.

Rights Related to Automated Decision Making and Profiling

OLC does not carry out any automated decision making or profiling of individuals.

Our Lawful Basis

There are six lawful bases under which organisations may collect personal data which are as follows:

- **Consent:** The individual has given clear consent for the handling of their personal data for a specific purpose.
- **Contract:** The handling of personal data is necessary for a contract with the individual, or because they have asked for specific steps to be taken before entering into a contract, such as give a quote.
- **Legal Obligation:** The handling of data is necessary for compliance with the law.
- **Vital Interests:** The handling of data is necessary to protect someone's life.
- **Public Task:** The handling of data is necessary to complete a task in the public interest.

- **Legitimate Interests:** The handling of data is necessary for the legitimate interests of an organisation or third party, unless there is good reason to protect the individual's personal data which overrides those legitimate interests.

The lawful basis under which OLC collects personal data is for the fulfilment of its **contract** with clients. The lawful basis under which special category data is held in the format of session notes is the provision of **explicit consent**.

The lawful basis under which OLC stores personal data after the termination of the contract, is that of **legitimate interest** to allow for future contact and potential further coaching sessions.

The OLC Website and the Use of Cookies

Cookies, also known as internet cookies, browser cookies or more officially HTTP cookies, are little packets of information that are sent from the website that you are visiting to be stored on your own computer. More specifically, they are sent from a computer somewhere else in the world (that hosts the website you are visiting) to your computer.

These cookies are normally harmless and make the internet experience much smoother for the user. However, some cookies can be used to track what people visit when on the website and the sorts of things they seem interested in, resulting in the development of targeted advertisement.

So, which are the 'good' and 'bad' cookies? Well, all cookies are 'good' in a way in that they serve useful functions. They become 'bad' when they are performing functions we want to stay clear of. A better question would be: Which are the *essential* and *non-essential* cookies?

Essential cookies: These are cookies that are stored on your computer that are needed for the basic functioning and use of the website in question.

Non-essential cookies: These are all other cookies not classed as essential, cookies such as those that analyse behaviour or target adverts. Non-essential cookies require active consent to be used. OLC **does not use any non-essential cookies** and does not track or record any information about any of its visitors via the use of cookies and services such as Google Analytics.

Contact Us

Contact Information

Email address: info@oxfordlearningcurve.co.uk

Phone number: 01865 604181

Company Details:

Oxford Learning Curve Ltd.

Registered Company Number 11336148

Registered Address:

International House, 142 Cromwell Road,

London SW7 4EF

Contacting the Appropriate Authorities

In the event that you wish to raise a concern about the way in which OLC uses or stores your personal data, please do not hesitate to contact Jackie Fairchild in the first instance. Should OLC fail to satisfactorily address your concerns, you may file a formal complaint with the Information Commissioner's Office (ICO). If you have any further questions about GDPR or require a more in-depth look, please refer to the Information Commissioner's Office's: Guide to the General Data Protection Regulation (GDPR), which can be found at the following address:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>