

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and our clients and prospective clients.

1.2 In this policy, "we", "us" and "our" refer to Celia Loan Coaching. For more information about us, see Section 14.

1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

2. The personal data that we collect

2.1 In this Section 2 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

2.2 We may process data enabling us to get in touch with our business contacts, clients and prospective clients ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.

2.3 We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data") – excluding client data as defined below. The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with submissions made using the website contact forms.

2.4 We may process personal data that are provided in the course of the provision of our services ("client data"). The client data may include your name, information relating to your personal history, your relationships, your relationship issues and your future plans. We may also collect information relating to your physical and mental health, medical conditions, sexual orientation and/or sex life ("sensitive data"). Please note, however, that whilst we may record this sensitive information in an unstructured form by hand in a notebook, we will never store any sensitive data that you may provide in any computer system or filing system. In line with UK data protection law, this sensitive data is therefore not subject to the provisions of this policy.

2.5 We may process information relating to transactions, including purchases of services, that our clients enter into with us ("transaction data"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you and/or our payment services provider.

2.6 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

3. Purposes of processing and legal bases

3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.

3.2 Coaching services – We may process client data for the purpose of providing our coaching services. With respect to our client's data, the legal basis for our processing of this data is the performance of our obligations under our coaching agreement. Insofar as this data relates to a person that is not our client, the legal basis for our processing of this data is the legitimate interests of our client, namely their interest in receiving professional coaching services.

3.3 Operations - We may process your contact data, communication data and transaction data for the purposes of operating our website, generating invoices, bills and other payment-related documentation, managing our relationships, communicating with you (excluding direct marketing communications) and complaint handling. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.

3.4 Direct marketing - We may process contact data for the purposes of creating, targeting and sending direct marketing communications by email, SMS and/or post. The legal basis for this processing will be consent.

3.5 Research and analysis - We may process usage data and transaction data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.

3.6 Record keeping - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

3.7 Security - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

3.8 Insurance and risk management - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.9 Legal claims - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.10 Legal compliance and vital interests - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

4. Providing your personal data to others

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

4.2 Your personal data held in our website database will be stored on the servers of our hosting services provider, GoDaddy.com, LLC. For more information, see <https://www.godaddy.com/en-uk/legal/agreements/privacy-policy>.

4.3 Financial transactions relating to our services are handled by our payment services provider, PayPal, Inc. We will share transaction data with our payment services provider only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services provider's privacy policies and practices at <https://www.paypal.com/uk/home>.

4.4 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. International transfers of your personal data

5.1 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our subcontractors to do so, during any period with respect to which the UK benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our subcontractors to do so, during any period with respect to which EEA states benefit from adequacy regulations under UK data protection law.

5.2 For information about international transfers of personal data made by our hosting services provider, GoDaddy.com, LLC., see <https://www.godaddy.com/en-uk/legal/agreements/privacy-policy>.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows: (a) contact data will be retained for a minimum period of 6 years following the date of the most recent contact between you and us, and for a maximum period of 7 years following that date; (b) communication data will be retained for a minimum period of 6 years following the date of the communication in question, and for a maximum period of 7 years following that date (c) client data will be retained for not more than 12 months following the end of the coaching relationship; (d) transaction data will be retained for a minimum period of 6 years following the date of the transaction, and for a maximum period of 7 years following that date; and (e) usage data will be retained for 36 months following the date of collection.

6.4 If you grant to us a licence to publish any of your personal data, we may continue to retain and publish that personal data after the end of the relevant retention period specified in this Section 6 in accordance with the applicable licence terms, subject to your data subject rights.

6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are: (a) the right to access - you can ask for copies of your personal data; (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data; (c) the right to erasure - you can ask us to erase your personal data; (d) the right to restrict processing - you can ask us to restrict the processing of your personal data; (e) the right to object to processing - you can object to the processing of your personal data; (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you; (g) the right to complain to a supervisory authority - you can complain about our processing of your personal data; and (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. Third party websites

8.1 Our website may include hyperlinks to, and details of, third party websites.

8.2 In general we have no control over, and are not responsible for, the privacy policies and practices of third parties.

9. Updating information

9.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

10. About cookies

10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

10.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

11. Cookie details

11.1 We and our service providers may use cookies for the following purposes: (a) authentication and status - we use cookies to identify you when you visit our website and as you navigate our website; (b) payments - we use cookies to maintain the state of your cart as you navigate our website; (c) personalisation - we use cookies to store information about your settings and preferences and to personalise our website for you; (d) security - we use to protect our website and services generally, including against fraud; (f) analysis - we use cookies to help us to analyse the use and performance of our website and services, and for research purposes relating to the improvement of our services; and (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies.

12. Managing cookies

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date information about managing cookies via these links: (a) <https://support.google.com/chrome/answer/95647> (Chrome); (b) <https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox); (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera); (d) <https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari); and (e) <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

13. Amendments

13.1 We may update this policy from time to time by publishing a new version on our website.

13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

14. Our details

14.1 This website is owned and operated by Dr Celia Loan.

14.2 You can contact us using our website contact form or by WhatsApp, telephone or email (using the contact details published on our website).

14.3 We are registered with the UK Information Commissioner's Office (registration number [NUMBER]).