

PRIVACY + DATA PROTECTION POLICY

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What a privacy notice is for: It tells you what to expect to be done with your personal information, how long it will be stored, and how it will be disposed of.

What information is collected and why: The personal information collected is name, contact details and self-reflective pre-coaching questionnaire for research or archiving purposes.

Lawful bases and data protection rights: Under UK data protection law, there must be a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website. Which lawful basis Echo Stone relies on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website.

Your right of access: You have the right to ask for copies of your personal information. You can request other information such as details about where Echo Stone gets personal information from, and who it is shared with. There are some exemptions which means you may not receive all the information you ask for.

Your right to rectification: You have the right to ask for personal information held about you, which you think is inaccurate or incomplete to be corrected or deleted.

You have the right to: Ask for your personal information to be deleted, limited and to object to the processing of your personal data.

Your right to data portability: You have the right to ask if the personal information you provided Echo Stone with be transferred to another organisation, or to you.

Your right to withdraw consent: When your consent is used as a lawful basis, you have the right to withdraw your consent at any time. If you make a request, you must be responded to without undue delay and in any event within one month. To make a data protection rights request, please contact Echo Stone using the contact details at the top of this privacy notice.

The lawful basis for the collection and use of your personal data is for: Research or archiving purposes

Consent: Echo Stone was given permission from you after you were given all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Legitimate interests: The collection or use of your information is because it benefits you, Echo Stone or someone else, without causing an undue risk of harm to anyone. All your data protection rights may apply, except the right to portability. The legitimate interests are : *The information collected from the completed self-reflection pre-coaching questionnaire enables the client to orientate to coaching, highlighting themes for discussion in future coaching sessions, serving as a learning platform for both client and coach.*

Where your personal information is sought from: Directly from you.

How long your information is kept: Refer to the schedule below.

Who your personal information is shared with: Your personal information may be shared with third parties if the information collected gives your coach reason to believe that you or any other person is at risk of harm. In which case, it will be brought to the attention of the relevant authorities or emergency services.

How to complain: If you have any concerns about the use of your personal data, you can make a complaint to Echo Stone using the contact details at the top of this privacy notice. If you remain unhappy with how your data has been used after making a complaint, you can also complain to the ICO.

Helpline - 0303 123 1113

www.ico.org.uk/make-a-complaint

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Retention schedule

As part of the day-to-day running of the business, Echo Stone collects and processes personal data from a variety of sources. This personal information is collated in several different formats including purchase orders, invoices, mailing lists, emails, pre-coaching questionnaires, coaching reflections logs, coaching session notes, testimonials and feedback. All personal data is stored in electronic form only.

Echo Stone will ensure that the personal data held is kept secure and is held for no longer than is necessary for the purposes for which it is being processed. In addition, the minimum amount of information will be retained to fulfil statutory obligations and the provision of goods or / and services, as required by data protection legislation, including the General Data Protection Regulation (GDPR).

This retention policy (along with its schedule) is a tool used to assist in making decisions on whether a particular document should be retained or disposed of. In addition, it takes account of the context within which the personal data is being processed and business practices. Decisions around retention and disposal are to be taken in accordance with this policy. As and when the retention period for a specific document has expired, a review is always carried out prior to the disposal of the document. This does not have to be time-consuming or complex. If a decision is reached to dispose of a document, careful consideration will be given to the method of disposal.

Echo Stone is responsible for keeping this retention schedule up to date in order to reflect changing business needs, new legislation, changing perceptions of risk management and new priorities for Echo Stone, and also responsible for determining (in accordance with this policy) whether to retain or dispose of specific documents, and will review annually the minimum retention periods or if the retention of a document is necessary for a potential claim.

Echo Stone will ensure that personal data is securely disposed of when it is no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant. The methods of disposal are to be appropriate to the nature and sensitivity of the documents concerned and include the deletion of electronic records held in cloud storage.

Document retention schedule: This table contains the retention periods that have been assigned to each type of record. This will be adhered to wherever possible, although it is recognised that there may be exceptional circumstances which require documents to be kept for either shorter or longer periods.

Record type	Storage reason	Retention period	Storage location	Method of deletion
Purchase orders and invoices	Tax purposes	7 years after last action	Microsoft OneDrive	Microsoft retention settings set to automatically delete content after the specified retention period
Mailing lists	Communication with audience	Archive after 6 months		
Email correspondence	To inform and support the learning and development of the client and coach	2 years after last action		
Pre-coaching questionnaire				
Coaching reflection logs				
Coaching session notes				
Testimonials + client feedback	To inform and support learning and development of the coach. To publish on social media platforms and Echo Stone website *	Retained indefinitely	Microsoft OneDrive Social media platforms Echo Stone website	N/A

** Testimonials and feedback will be anonymized, unless the client gives express consent for their name to be used when the testimonial or feedback is provided.*