



BLOOMING BRANCH GROUP

# Blooming Branch Group LLC

## Data Privacy Policy

**Effective Date:** 1 May 2026

**Last Updated:** 1 May 2026

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### 1. Introduction

Blooming Branch Group LLC (“we,” “our,” or “the Company”) is committed to protecting your personal data and safeguarding the confidentiality of the coaching relationship.

We operate in accordance with:

- The ethical standards of the International Coaching Federation (ICF)
- The General Data Protection Regulation (EU) 2016/679 (“GDPR”)

This policy explains how we collect, use, store, and protect your personal data.

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### 2. Data Controller

Blooming Branch Group LLC is the **Data Controller** for personal data collected in connection with our coaching services.

 **Contact:** [lynn@bloomingbranchgroup.com](mailto:lynn@bloomingbranchgroup.com)

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### 3. Personal Data We Collect

We collect only the information necessary to provide coaching services and operate our business effectively.

#### a. Identity and Contact Information

- Name
- Email address
- Phone number
- Mailing address

#### b. Professional Information (if applicable)

- Job title
- Organization

#### c. Administrative Information

- Coaching session dates and duration
- Hours logged
- Scheduling records

#### d. Financial Information

- Invoices
- Payment status

### Our Approach to Data Minimization

We intentionally limit the data we collect and retain. Specifically, we:

- Do **not** record coaching sessions as a standard practice
  - Do **not** retain detailed personal disclosures
  - Do **not intentionally collect special category data** (e.g., health or other sensitive personal data), unless it is clearly necessary and explicitly agreed in advance
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### 4. Legal Basis for Processing

We process personal data in accordance with Article 6 of the GDPR on the following legal bases:

- **Contractual necessity** – to provide coaching services
  - **Legitimate interests** – to manage scheduling, communication, and operations
  - **Legal obligations** – to meet tax, accounting, and regulatory requirements
  - **Consent** – where applicable
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## 5. How We Use Personal Data

We use your personal data only for the purposes for which it was collected, including:

- Delivering coaching services
- Scheduling and managing appointments
- Communicating with you
- Maintaining records of services provided
- Issuing invoices and managing financial records
- Complying with legal obligations

We do **not** sell, rent, or use your personal data for marketing purposes.

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## 6. Confidentiality of Coaching

Confidentiality is central to our work.

In alignment with ICF standards:

- The content of coaching sessions is treated as **confidential**
- The existence of the coaching relationship is also treated as **confidential**

Exceptions are limited and apply only:

- Where disclosure is required by law
  - Where there is a risk of harm
  - With your explicit consent
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## 7. Third-Party Service Providers

We use trusted service providers to support our operations:

### Google Workspace

Used for:

- Email communication
- Calendar scheduling
- Limited document storage
- Video conferencing

## QuickBooks Online

Used for:

- Invoicing
- Payment tracking
- Accounting and financial records

These providers act as **Data Processors** and process personal data on our behalf under appropriate contractual safeguards, including Data Processing Agreements.

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## 8. Payment Information

- We **do not store credit card or payment details**
  - Payments are processed through secure third-party systems
  - Financial records retained are limited to invoices and payment status
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## 9. Data Sharing

We do not share your personal data outside Blooming Branch Group LLC except:

- With essential service providers (e.g., Google Workspace, QuickBooks Online)
  - Where required by law
  - With your explicit consent
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## 10. International Data Transfers

Blooming Branch Group LLC operates in the United States.

If you are located in the European Economic Area (EEA), your personal data may be transferred to and processed in the United States or other countries.

We protect your data by implementing appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)
  - Use of GDPR-aligned service providers
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## 11. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes described in this policy and to meet legal obligations.

- Financial records: retained for up to **7 years**
- Client administrative data: retained for the duration of the coaching relationship and a reasonable period thereafter
- Communication records: retained as needed for operational purposes

Data is reviewed periodically and securely deleted when no longer required.

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## 12. Data Security

We implement appropriate technical and organizational measures to protect your personal data, including:


- Secure cloud-based systems
  - Password protection and multi-factor authentication
  - Access controls on a need-to-know basis
  - Ongoing data minimization practices
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## 13. Your Rights Under GDPR

If you are located in the EU/EEA, you have the right to:

- Access your personal data
- Correct inaccurate or incomplete data
- Request deletion of your data
- Restrict or object to processing
- Request a copy of your data (data portability)
- Withdraw consent where processing is based on consent
- Lodge a complaint with your local data protection authority

To exercise any of these rights, please contact:

 [lynn@bloomingbranchgroup.com](mailto:lynn@bloomingbranchgroup.com)

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## 14. Updates to This Policy

We may update this policy from time to time. The most current version will always be available on our website.

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## 15. Contact

Please contact **Blooming Branch Group LLC** at [lynn@bloomingbranchgroup.com](mailto:lynn@bloomingbranchgroup.com) for further information.