

Privacy Notice

How we collect, use and protect your personal information

FIELD	DETAIL
VERSION	3.3
AUTHOR	Emily Forbes, Founder
EFFECTIVE DATE	30 September 2026
PRACTICE	Wylde Wellbeing Ltd — Data Controller, registered with the ICO reference ZB542823. Registered in England and Wales, company number 14340272
REVIEW DATE	26 August 2027
LEGAL BASIS	UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025; PECR
CONTACT	info@wyl dewellbeing.uk
ADDRESS	Highcroft, Factory Road, Cowbridge, Vale of Glamorgan, CF71 7JD
COMPANION DOCUMENT	Privacy Notice — The Wylde App, at app.wyl dewellbeing.uk/legal/privacy

Our commitment in one sentence

We hold what you tell us with care, we tell you plainly what we do with it, and we never trade on it.

This privacy notice applies to all clients, prospective clients, website visitors, newsletter subscribers, referral partners, and anyone else who interacts with Wylde Wellbeing. It is written in plain language. If anything is unclear, please contact us and we will explain.

The Wylde App has its own privacy notice. Wylde Wellbeing Ltd is the data controller for both, but the app does different things with different data, so it is covered separately rather than folded in here. If you are a member of The Wylde App — or thinking of joining — the notice that governs your account, what you write in the app, and the Wylde Energy Economy is the Privacy Notice for The Wylde App, at app.wyl dewellbeing.uk/legal/privacy. If you are both a coaching client and an app member, both notices apply to you, each to its own part.

Our services are for adults. Wylde Wellbeing does not work with children. Coaching, the Wylde Life Audit and The Wylde App are offered to people aged 18 or over, and we do not knowingly collect personal data from anyone under 18. If we become aware that someone under 18 has given us their information or created an account, we will delete it and close the account.

Legislative framework

This notice is issued under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018), and the Data (Use and Access) Act 2025 (DUAA), the main provisions of which came into force on 5 February 2026. We also comply with the Privacy and Electronic Communications Regulations (PECR) where applicable.

What is new in version 3.3

The Wylde App is no longer covered in this notice. It has its own privacy notice, which is now the single source of truth for app membership data and the Wylde Energy Economy. Sections 3A and 3B have been removed, along with the app rows in the lawful basis table (section 2), the retention schedule (section 5) and the processor table (section 6.1). Nothing about how the app works has changed — only which document describes it.

1. Information We Collect

We collect personal information in the following categories, depending on how you engage with us.

1.1 Client and service information

CATEGORY	EXAMPLES
Identity data	Full name, date of birth
Contact data	Email address, phone number, postal address
Health information (Special Category)	Health conditions, chronic illness, physical and mental wellbeing relevant to coaching engagement, dietary requirements, allergies
Session data	Notes, goals, progress, reflections from coaching sessions
Communication records	Emails, messages, scheduling correspondence
Financial data	Payment details, invoicing records, transaction history
Contract records	Signed coaching agreements, consent forms
Referral information	Information passed to us by a referring clinician or partner organisation, with your knowledge
Feedback and complaints	Compliments, concerns or complaints you raise with us
Sponsorship and partnership records	Information relating to sponsorship, collaboration or partnership arrangements

1.2 Website and marketing information

CATEGORY	EXAMPLES
Website usage data	Pages visited, time on site, user journey, cookie data, IP address
Marketing preferences	Whether you have subscribed to our newsletter or opted in to marketing communications
Consent records	Records of when and how you gave or withdrew consent

1.3 Session recording data (Fathom)

Important: session recording requires your explicit consent

Where you have given explicit consent, sessions may be recorded using Fathom (Fathom Video Inc.). Fathom

processes audio, video, transcripts, and AI-generated summaries of sessions. This involves the transfer of data to the USA. Full details are set out in Section 6 (Data Processors) and in our separate AI Policy.

You may withdraw consent for recording at any time without consequence to your coaching engagement.

1.4 People we work with, other than clients

Where we engage an intern, volunteer, associate coach or contractor, we also collect and hold employment-related information about that person — including application and placement records, agreements, emergency contact details, and any health and safety records arising from their work with us. This information is held for the purposes of managing the working relationship and meeting our legal obligations.

1.5 Where we collect information from

- Directly from you — when you enquire about our services, complete an intake form, sign a coaching agreement, attend a session, or contact us
- From your use of our website — via cookies and analytics tools
- From third-party scheduling and administrative software — including FEA Create
- From session recording and transcription tools — Fathom, where consent has been given
- From a referring clinician or partner organisation — where you have been referred to us and are aware of the referral
- From publicly available sources — only in very limited circumstances, such as professional background information where relevant

2. How and Why We Use Your Information

Under UK data protection law, we must have a lawful basis for processing your personal data. The table below sets out the purposes for which we use your information and the lawful basis we rely on for each.

PURPOSE	DATA USED	LAWFUL BASIS
Providing coaching services	Identity, contact, health, session data	Contract; Consent (for health data)
Managing bookings and scheduling	Identity, contact, calendar data	Contract
Issuing invoices and processing payments	Identity, contact, financial data	Contract; Legal obligation
Recording and transcribing sessions (Fathom)	Audio, video, transcript, AI summary	Explicit consent
Keeping client session notes and records	Session data, health information	Contract; Consent
Accepting and managing clinical referrals	Identity, contact, referral information	Contract; Consent
Sending service-related communications	Contact data, communication records	Contract; Legitimate interests
Marketing and newsletter communications	Name, email, marketing preferences	Consent

PURPOSE	DATA USED	LAWFUL BASIS
Website analytics and improvement	Website usage data, cookies	Consent (non-essential cookies); Legitimate interests (strictly necessary)
Handling queries, concerns or complaints	Identity, contact, correspondence	Contract; Legal obligation
Safeguarding — disclosure where required	Relevant personal and health data	Legal obligation; Vital interests
Managing interns, volunteers and contractors	Placement, agreement and health and safety records	Contract; Legal obligation
Complying with legal and regulatory obligations	Relevant data as required by law	Legal obligation
Keeping financial and business records	Financial and contract data	Legal obligation

3. Special Category Data

Because coaching often involves sensitive personal information — including health conditions, mental wellbeing, trauma history, chronic illness, and identity — we process what UK GDPR classifies as Special Category Data. This carries a higher level of legal protection.

Special Category Data we may process includes:

- Physical health conditions, chronic illness, disability, and symptoms
- Mental health, emotional wellbeing, and psychological history relevant to coaching
- Any other sensitive personal information you choose to share in a coaching context

We process Special Category Data only:

- With your explicit consent, which you may withdraw at any time
- Where necessary for the purposes of the coaching contract
- Where required by law, including safeguarding obligations

We apply the highest standards of care to this data. It is never shared with third parties for commercial or marketing purposes. Where session recording tools (Fathom) process Special Category Data, this is covered by our signed Data Processing Agreement, which includes specific safeguards for sensitive data.

4. Automated Decision-Making and AI

We do not make any solely automated decisions about you that have legal or similarly significant effects. All coaching decisions, recommendations and interventions are made by Emily Forbes as the qualified lead coach, not by any AI system.

We use AI tools in the following limited ways, with your knowledge:

- Fathom: AI-assisted transcription and session summary generation, used only where you have given explicit consent to recording.

- Claude (Anthropic): used by the coach for session preparation, framework research and practice development. Only anonymised or pseudonymised scenario information is used. No identifiable client data is entered into this tool.

The Wylde App is AI-free. This is set out in full in the app's own privacy notice.

Our full AI Policy, which explains our AI use in detail including risk management and data security, is available on request or at [wylde wellbeing.uk](https://wyldewellbeing.uk). Clients are provided with the AI Policy before coaching begins.

DUAA 2025: automated decision-making

The Data (Use and Access) Act 2025, in force from 5 February 2026, updated the UK's approach to automated decision-making. As we do not undertake solely automated decision-making with significant effects, these provisions do not currently apply. We keep this under review as our use of technology evolves.

5. How Long We Keep Your Information

This section is our data retention schedule. It sets out every category of record we hold, how long we keep it, and why.

DATA TYPE	RETENTION PERIOD	REASON
Coaching session notes and records	7 years after engagement ends	Professional standards; consistent with the retention period stated in the Coaching Agreement
Coaching contracts and agreements	6 years after contract ends	Legal obligation (Limitation Act 1980)
Financial records and invoices	6 years from end of financial year	Legal obligation (HMRC)
Health and Special Category Data (coaching)	7 years after engagement ends, or as required by applicable law	Professional standards; consistency with session records
Session recordings and transcripts (Fathom)	As set out in our DPA with Fathom; deletable on request	Consent; contractual provision
Email and communications	3 years after last contact	Legitimate interests; legal obligation
Marketing consent records	Until consent is withdrawn, then 1 year	Legal obligation (PECR)
Website analytics data	26 months from collection	Legitimate interests
Complaints and safeguarding records	7 years after case closure	Legal obligation; professional standards
Business insurance documents	7 years after policy ends	Legal obligation
HR, placement and payroll records	6 years after the working relationship ends	Legal obligation; HMRC
Health and safety records	3 years from the date of the record	Legal obligation (RIDDOR and associated regulations)
Health and safety records — serious incidents and hazardous substances	40 years	Legal obligation (COSHH and associated regulations)

When data is no longer required, it is securely deleted or anonymised. Anonymised data may be retained for longer for practice development or statistical purposes, but can no longer identify you.

6. Who We Share Your Information With

6.1 Data processors

A data processor is an organisation that processes personal data on our behalf and under our instruction. We only use data processors that can demonstrate UK GDPR compliance. We have written contracts in place with each.

PROCESSOR	WHAT THEY DO	DATA LOCATION	SAFEGUARD
FEA Create	Scheduling, client data storage, contracts, invoicing, client portal	UK / EEA	GDPR-compliant contracts
Fathom Video Inc.	Session recording, transcription, AI-generated summaries (with consent only)	USA	DPA signed April 2026; UK Addendum (ICO); EEA SCCs; SOC 2 Type II certified; end-to-end encryption
Zoom	Video conferencing for sessions	USA / EEA	Privacy settings applied; standard GDPR provisions
Email provider	Client and business communications	UK / EEA	Standard contractual protections
Loom (Loom, Inc., an Atlassian company)	Screen-recorded video walkthroughs sent to clients. Holds the recording, the email address a video is shared to, and viewer analytics: who opened it and when. Recordings are generic demonstrations; client information is not shown on screen.	USA	Atlassian Data Processing Addendum (April 2026) held on file, incorporating EU Standard Contractual Clauses and the UK International Data Transfer Addendum. Sharing restricted to named recipients.

The processors handling app data — Supabase, Stripe and Vercel — are listed in the app's own privacy notice.

6.2 International transfers

Where data is transferred outside the UK (for example, to Fathom Video Inc. in the USA), we ensure that appropriate safeguards are in place as required by UK GDPR. These include:

- UK International Data Transfer Agreements (IDTAs) and/or the ICO UK Addendum to EEA Standard Contractual Clauses
- Adequacy decisions where the destination country has been assessed as providing equivalent protection
- Explicit consent from you where no other safeguard applies

6.3 Other organisations we may share data with

We may share your personal data with the following where legally required or necessary:

- Safeguarding authorities — where there is a risk of serious harm to you or others

- Law enforcement or regulatory authorities — where legally required
- Professional or legal advisors — for legal, compliance or professional purposes
- External auditors or inspectors — where required by law
- Our nominated representative — in the circumstances set out in our Business Continuity Policy, so that your engagement can be closed properly if we are unable to continue

6.4 Referral partners

Where you come to us through a clinical or partner referral, or where we hold sessions at a partner's premises, that organisation and Wylde Wellbeing act as separate data controllers. We do not share the content of your coaching sessions with a referring clinician or partner. Where a referrer asks us to confirm that an engagement has begun or ended, we will only do so with your consent, and we will tell you what has been confirmed.

What we never do

We never sell your personal data. We never share client health or session data with third parties for commercial or marketing purposes. We never share identifiable client information with AI tools used for practice support. We never share the content of your coaching sessions with a referring clinician.

7. Cookies and Website Tracking

Our website uses cookies — small text files placed on your device when you visit — to help it function, to understand how it is used, and to support marketing where you have given consent.

COOKIE TYPE	LAWFUL BASIS	WHAT THEY DO
Strictly necessary	Legitimate interests	Essential for the website to function. Cannot be turned off.
Performance / analytics	Consent	Help us understand how visitors use the site (e.g. Google Analytics). Only set with your consent.
Functionality	Consent	Remember your preferences and personalise your experience.
Marketing / targeting	Consent	Used by advertising partners to show relevant content. Only set with your consent.

You can manage or withdraw cookie consent at any time through your browser settings or through any cookie management tool on our website. Withdrawing consent for non-essential cookies will not affect your ability to use our website or our services.

8. Your Data Protection Rights

Under UK GDPR and the DUAA 2025, you have the following rights. The rights that apply to you in any given situation depend on the lawful basis we rely on for processing.

YOUR RIGHT	WHAT IT MEANS
Right of access	You can ask us for a copy of the personal data we hold about you, and information about how we use it. We must respond within one month.
Right to rectification	You can ask us to correct inaccurate or incomplete personal data.
Right to erasure	You can ask us to delete your personal data in certain circumstances. This right does not apply where we are required by law to retain the data.
Right to restriction of processing	You can ask us to limit how we use your data in certain circumstances.
Right to object	You can object to processing based on legitimate interests. We must stop unless we can demonstrate compelling grounds to continue.
Right to data portability	Where processing is based on consent or contract and is automated, you can ask us to transfer your data to another organisation or to you directly. We provide this on request, within one month, in a structured, commonly used, machine-readable format.
Right to withdraw consent	Where we rely on consent as our lawful basis, you can withdraw it at any time. This does not affect the lawfulness of processing before withdrawal.
Right to complain	You have the right to complain to the ICO if you are unhappy with how we handle your data. See Section 9.

To exercise any of your rights, please contact us at info@wylde wellbeing.uk. We will respond within one month of receiving your request. We may need to verify your identity before we can action your request.

9. How to Complain

Data protection complaints procedure (DUAA 2025, in force from 19 June 2026)

The Data (Use and Access) Act 2025 requires us to have a formal data protection complaints procedure. If you wish to raise a concern about how we handle your data, please contact us at info@wylde wellbeing.uk. We will acknowledge your complaint within five working days and respond substantively within 30 days.

Complaints about the coaching itself, rather than about your data, are handled under our separate Complaints Procedure, which is available on request and at wylde wellbeing.uk.

If you have concerns about how we handle your personal data, please contact us in the first instance:

- Email: info@wylde wellbeing.uk
- Address: Highcroft, Factory Road, Cowbridge, Vale of Glamorgan, CF71 7JD

We will respond promptly and treat all concerns with care and confidentiality.

If you remain unhappy after raising a concern with us, you have the right to complain to the Information Commissioner's Office (ICO):

- ICO address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- ICO helpline: 0303 123 1113
- ICO website: ico.org.uk/make-a-complaint

You also have the right to seek legal remedies if you believe your data protection rights have been infringed.

10. Keeping This Notice Up to Date

We review this privacy notice regularly and update it when:

- Our data practices change
- We introduce a new data processor or AI tool
- We begin working from new premises or with a new referral partner
- Legislation or ICO guidance changes
- The annual review date falls due

Where changes are material, we will notify active clients directly. The version history is set out below.

VERSION	DATE	CHANGES	AUTHOR
1.0	15 Oct 2025	Initial ICO-template privacy notice issued	Emily Forbes
2.0	1 May 2026	Full redraft: DUAA 2025 compliance; AI and Fathom DPA added; cookies section; automated decision-making; DUAA complaints procedure; lawful basis table	Emily Forbes
3.0	26 Aug 2026	v1.0 (ICO template) formally superseded and its remaining content absorbed: HR/placement and health and safety retention periods, and sponsorship records, added to this notice. Section 5 restated as the full data retention schedule. Session note retention aligned to 7 years to match the Coaching Agreement. New: referral partners (6.4), people we work with other than clients (1.4), cross-reference to the Complaints Procedure and Business Continuity Policy.	Emily Forbes
3.1	On app go-live	The Wylde App added, folding in the App Additions drafted 5 July 2026 and updated 2 August 2026, which had not previously been merged. New sections 3A (app membership data) and 3B (the energy economy — health data, including symptoms, medication, menstrual cycle phase and diagnosis). New processors: Supabase (EU, Frankfurt), Stripe / Stripe Tax, Vercel. New app retention rows in section 5, and app lawful bases in section 2. Section 4 records the app as AI-free, per AI Governance File v1.2. Company number added. Telephone number removed from the published contact details — email and postal address satisfy UK GDPR Art. 13–14.	Emily Forbes
3.2	11 Sep 2026	Two product decisions recorded. Section 3B: the energy economy cannot be switched off as a separate feature while membership continues, so the promise that withdrawing consent leaves the rest of the app untouched is replaced with the actual route — leave fields unused, delete entries yourself, or email to withdraw, with deletion within 30 days. Section 3A amended to match. Section 8: data portability clarified — provided manually on request within one month in a structured, commonly used, machine-readable format, with no self-service export in the app.	Emily Forbes
3.3	30 Sep 2026	The Wylde App separated into its own privacy notice, which becomes the single source of truth for app processing. Sections 3A and 3B removed; app rows removed from the lawful basis table (2), the retention schedule (5) and the processor table (6.1); app clauses removed from 1.5, 4, 6.2, 6.4 and 8. The app's processing is unchanged — only the document describing it. Effective date fixed at 30	Emily Forbes

VERSION	DATE	CHANGES	AUTHOR
		September 2026 rather than expressed as the app's go-live date.	

Privacy notice declaration

This notice has been prepared in accordance with UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. It reflects data processing practices at Wylde Wellbeing Ltd. The Wylde App is covered by its own privacy notice, at app.wyldewellbeing.uk/legal/privacy.

Your privacy matters. If anything in this notice is unclear, we welcome your questions — info@wyldewellbeing.uk