

PRIVACY POLICY

Inner Beat Coaching provides confidential professional coaching services with a focus on reflective practice, performance and personal development.

1. Who I Am

Inner Beat Coaching is a sole trader coaching consultancy operated by:

Simon John Ellis

Woodlee, Innerleithen Road, Peebles, EH45 8BD

Email: simon@innerbeatcoaching.co.uk

ICO Registration Number: [Insert if registered]

For the purposes of UK GDPR and the Data Protection Act 2018, I am the **Data Controller**.

2. How This Relates to Your Coaching Contract

This Privacy Policy forms part of the overall coaching agreement between us.

- Coaching is a confidential, professional relationship.
- Personal data is processed only for the purposes of delivering coaching services.
- Sensitive personal information shared during sessions is treated with heightened care.

Where appropriate, explicit consent to process special category data is obtained within the coaching contract.

3. Data Protection Principles

Personal data is:

- Used fairly, lawfully and transparently
- Collected for specified and legitimate purposes
- Limited to what is necessary
- Accurate and kept up to date
- Retained only as long as necessary
- Protected by appropriate security measures

4. Personal Data Collected

Contact Data

- Name
- Email address
- Telephone number
- Organisation and role (if relevant)

Coaching Data

- Session dates
- Agreed goals and objectives
- Notes necessary for continuity of service
- Reflections and themes discussed

Financial Data

- Invoices
- Payment records
- Contract documentation

Data is collected directly from you, email correspondence, website contact forms or scheduling platforms where used unless otherwise agreed.

5. Special Category Data

Coaching conversations may involve sensitive personal data including information relating to:

- Health
- Ethnicity
- Religious or philosophical beliefs
- Political opinions
- Sexual orientation
- Trade union membership

Such data is processed only where:

- Explicit consent is obtained where required under Article 9 UK GDPR; and
- Processing is necessary for the provision of coaching services; and
- Appropriate technical and organisational safeguards are applied.

I do not routinely process criminal conviction data.

6. Performance and Sport Clients (If Applicable)

Where coaching is delivered within performance, leadership or sporting contexts:

- Performance metrics are not collected unless voluntarily shared.
- Psychological reflections are treated as confidential personal data.
- No profiling or automated performance scoring is conducted.
- No information is shared with clubs, managers, or organisations without explicit consent.

7. Lawful Basis for Processing

Personal data is processed under:

- **Contract** – to provide coaching services
- **Legitimate Interests** – to operate and improve the consultancy
- **Consent** – for special category data
- **Legal Obligation** – tax and safeguarding requirements

In practice:

- Contact and coaching data are processed under the lawful basis of Contract.
- Financial data is processed under Legal Obligation (HMRC requirements).
- Business improvement activities are processed under Legitimate Interests.
- Special category data is processed under Explicit Consent.

8. Confidentiality and Safeguarding

Coaching sessions are confidential.

Confidentiality may be broken only where:

- There is risk of serious harm to you or others
- Disclosure is legally required
- A court order compels disclosure

Where possible, this will be discussed with you first.

9. Supervision and Anonymisation

As part of maintaining professional standards, I may discuss coaching work within professional supervision.

- No identifying details are shared.
- Client names and identifiable characteristics are removed.

- Discussions focus on themes, process and ethical considerations only.

10. Data Retention

Personal data is retained only as long as necessary:

- Coaching records: up to 7 years after completion
- Financial records: 6 years (HMRC requirement)
- General enquiries: up to 12 months

Records may be securely deleted or anonymised once no longer required.

Email correspondence is retained in line with coaching and financial record retention requirements unless deletion is requested earlier.

11. Data Security

Security measures include:

- Password-protected devices
- Encrypted storage services where applicable
- Two-factor authentication where available
- Secure cloud providers
- Restricted access (sole trader – no staff access)

12. Sharing of Data

Data may be shared only with:

- Accountants or professional advisers
- Secure payment processors
- IT or hosting providers

All third parties are required to process data securely and lawfully.

Where service providers store data outside the UK, appropriate safeguards such as UK adequacy regulations or approved contractual clauses are in place.

13. Your Rights

Under UK GDPR, you have the right to:

- Be informed
- Access your data
- Rectify inaccuracies
- Request erasure (where applicable)
- Restrict processing
- Data portability
- Object to certain processing

You also have rights concerning:

- Automated decision-making
- Profiling

Inner Beat Coaching does not use automated decision-making or profiling.

To exercise your rights, contact:

privacy@innerbeatcoaching.co.uk

Requests will be responded to within one calendar month in accordance with UK GDPR.

14. Complaints

You may raise concerns directly with me.

You also have the right to complain to the:

Information Commissioner's Office (ICO)

www.ico.org.uk