



## Privacy Policy (Effective 25 May 2018)

This Privacy Policy is for *Sylvana Caloni*, trading as *SC Executive Coaching* or *SC Executive and Personal Coaching* registered with the Information Commissioner's Office (reference ZA337582).

Under the EU/UK General Data Protection Regulations, [GDPR](#), I am the "data controller" and collect personal data about you for the purposes of delivering services to best suit your requirements and preferences as detailed below.

I respect your privacy and confidentiality and take appropriate steps to protect your personal data.

Your personal data will never be sold to 3<sup>rd</sup> parties for marketing purposes.

Your personal information will never be shared without your permission. Except where I am under a duty of disclosure in order to comply with a legal obligation, where you disclose any criminal or fraudulent activities, where there is a valid court order or witness summons, or there is imminent or likely risk of danger to self or others.

## Reasons for processing your personal data

Under section 6(1)(b) of the *GDPR* I may collect your personal data for the legal bases of **Contract** for services (for example, coaching, facilitation, training and consulting), **Consent** (for example, professional log of coaching hours, sign-up to newsletters) and **Legitimate Interest** (registration for events such as Peer Advisory Circles, pilot workshops etc.)

## What personal data is processed?

The type of personal information collected may include, for example:

1. your name,
2. home and/or business address,
3. the name of your employer,
4. your job title,
5. email address,
6. phone numbers,
7. meeting times,
8. notes and emails from coaching sessions, results of questionnaires and psychometric profiles and 360-degree stakeholder reports,
9. name, contact details and number of coaching hours for the purposes of professional [accreditation](#) with the International Coach Federation (ICF) or training schools.

### How long is the information held and how is it stored?

The personal data is held for the duration of our business relationship and is stored safely in controlled access hard copy storage (for paper, forms, and notes) and controlled access environments (for emails, downloaded electronic reports and electronic documents).

Personal data from (8) above is destroyed securely upon completion of the engagement. Invoices and contracts will be retained for as long as is necessary for record keeping and to comply with legal and HMRC requirements.

Personal data from (9) above will be retained until is necessary for the attainment of accreditation. The ICF destroys application materials six months after my application has been processed.

To ensure compliance with GDPR and alignment with best practices for promoting data security, ICF no longer requires that I submit my coaching log. However, to ensure the integrity of this updated process, ICF will conduct periodic audits to verify applicants' coaching experience. This means that I should continue to obtain and document my clients' consent to store their information in my professional log.

### Transferring your personal data abroad

If a random audit is required of my professional log the personal data will be transferred to the ICF in the US which operates under the EU-US Privacy Shield and is compliant with GDPR. The information in the client coaching log will only be seen by ICF staff. Client information is never shared or sold to another party or used for any purpose other than the review of my application. Clients listed on the professional log may be contacted by ICF to verify the information. If they are contacted, clients will not be asked about coaching topics.

### Complaints or queries

I encourage people to bring it to my attention if they think that my collection or use of information is unfair, misleading or inappropriate. I would also welcome any suggestions for improving my procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of collection and use of personal information. However, I am happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

### Your Rights and access to personal information

I try to be as open as I can be in terms of giving people access to their personal information. Individuals can find out if I hold any personal information by making a "subject access request." If I do hold information about you, I will:

- give you a description of it;
- tell you why I am holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request for any personal information I may hold you need to put the request in writing by emailing [sylvana@sylvanacaloni.com](mailto:sylvana@sylvanacaloni.com) or sending it to the address provided below.

If you agree, I will try to deal with your request informally, for example, by providing you with the specific information you need over the telephone.

If I do hold information about you, you can ask me to correct any mistakes by contacting Sylvana Caloni by email [sylvana@sylvanacaloni.com](mailto:sylvana@sylvanacaloni.com) or writing to the address below.

### **Changes to this Privacy Policy**

This Privacy Policy was last updated on 25<sup>th</sup> May 2018. I reserve the right to update and change this Privacy Policy from time to time to reflect any changes to the way in which I process your personal data or changing legal requirements.

### **How to contact me**

If you want to request information about my privacy policy, you can email me [sylvana@sylvanacaloni.com](mailto:sylvana@sylvanacaloni.com) or write to:

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UK