﻿**Pinnacle Executive Coaching customer privacy notice**

This privacy notice tells you what to expect us to do with your personal information.

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**Contact details**

* Post: 15 Highlands Road, ANDOVER, Hampshire, SP10 2PX, GB
* Telephone: 07738159583
* Email: steve@pinnaclecoaching.uk

**What information we collect, use, and why:**

We collect or use the following information to provide and improve products and services for clients:

* Names and contact details
* Addresses
* Gender
* Pronoun preferences
* Occupation
* Date of birth
* Third party information (such as family members or other relevant parties)
* Payment details (including card or bank information for transfers and direct debits)
* Employment details (including salary, sick pay and length of service)
* Information relating to compliments or complaints
* Video recordings
* Audio recordings (eg calls)
* Records of meetings and decisions

We collect or use the following personal information for the operation of client or customer accounts:

* Names and contact details
* Addresses
* Purchase or service history
* Account information, including registration details

**Lawful bases and data protection rights**

Under UK data protection law, we must have 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 we rely 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 us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#roa).
* **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtr).
* **Your right to erasure** - You have the right to ask us to delete your personal information. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rte).
* **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtrop).
* **Your right to object to processing** - You have the right to object to the processing of your personal data. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rto).
* **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtdp).
* **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [You can read more about this right here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#rtwc).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

**Our lawful bases for the collection and use of your data**

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

* **Consent** - we have permission from you after we gave you 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.
* **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
* **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
	+ We will keep records of coaching sessions so that individuals can monitor their progress and we can challenge and support them throughout their coaching. This will include the goals, development needs and outcomes as discussed and agreed during coaching sessions.
	+ There may be a requirement when agreed with the coachee to share information with managers or other stakeholders where the coachee agrees that this is in the best interest of their development.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

* Consent - we have permission from you after we gave you 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.
* Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Where we get personal information from

* Directly from you

How long we keep information

* We will keep your personal information for the purposes set out in this privacy policy and in accordance with the law and relevant regulations. We will never retain your personal information for longer than is necessary. In most cases, our retention period will come to an end 7 years after the end of your relationship with us. It is not always possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the purpose for which we collected that data originally. However, we may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

**Who we share information with**

Others we share personal information with

* Third parties:
	+ Those third parties identified by the coachee and only when agreed in support of their personal development aims.

**How to complain**

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we’ve used your data after raising a complaint with us, you can also complain to the ICO.

The ICO’s address:

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

Helpline number: 0303 123 1113

Website: [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

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4 October 2024