

Privacy Policy Notice

The policy: This privacy policy notice is served by Graeme Barry, Sarah Chase, Mark Smith and Jennifer Howells under the website www.oceanscollective.com. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and or refrain from submitting your personal data to us.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, [Oceans Collective].
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.

Key principles of GDPR:

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

Processing of your personal data

Under the GDPR (General Data Protection Regulation) we control and / or process any personal information about you electronically using the following lawful bases.

- We are exempt from registration in the ICO Data Protection Register because we only store data for our own records for professional accreditation and marketing purposes.
- **Lawful basis:** Consent
Where our purpose for processing is: keeping a log of clients
Which is necessary because: professional accreditation
We process your information in the following ways: we store your name, contact details, start and end date of coaching and number of paid and pro bono hours
Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
Sharing your information: We may share your information with the International Coach



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Federation (www.coachfederation.org) if they decide to audit our records of coaching hours.

- **Lawful basis:** Legitimate interests
Where our purpose for processing is: marketing
Which is necessary because: we need to maintain relationships with clients
We process your information in the following ways: we keep your email address and notes of conversations relating to the provision of our services
Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
Sharing your information: We do not share your information with third parties. / We do share your personal information with third parties and they include; .
- **Lawful basis:** Contract
Where our purpose for processing is: recording details of sessions
Which is necessary because: we need to provide our best coaching to fulfil our contract with clients
We process your information in the following ways: we may keep notes of sessions, transcripts and recordings of sessions in password-protected files and folders, all of which would be anonymous.
Data retention period: We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists.
Sharing your information: We may recordings with third parties and they include only our professional supervisor for the purpose of continuing professional development.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

Your individual rights

Under the GDPR your rights are as follows. You can read more about [your rights in details here](#);

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;



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- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Email marketing messages & subscription

We will not send you email marketing messages.

