



Privacy Policy

Introduction

Welcome to my privacy policy for Contour Coaching. I have also included my Data Complaints Policy at the end of this document, should you need it.

I respect your privacy and am committed to protecting your personal data. This privacy policy will inform you about how I look after your personal data when you visit my website, social media accounts or my online communities (regardless of where you visit them from), or where you sign up for my services, and will tell you about your privacy rights and how the law protects you. When I refer to 'website' in this policy the term will be deemed to include all of my online pages and social media accounts and online communities from time to time.

It contains important information on who I am and how and why I collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact me or supervisory authorities in the event you have a complaint.

I collect, use and am responsible for certain personal information about you. When I do so I am subject to data protection laws which apply across the European Union and the United Kingdom and I am responsible as 'controller' of that personal information for the purposes of those laws.

By providing me with your data, you warrant to me that you are over 13 years of age.

1. Important information and who I am

Purpose of this privacy policy

This privacy policy aims to give you information on how I collect and process your personal data through your use of my website and services, including any data you may provide through my website when you fill in my contact form, book a meeting with me, sign up to receive emails from me or purchase a service from me.

It is important that you read this privacy policy so that you are fully aware of how and why I am using your data.

Data relating to children

This website is not intended for children and I do not knowingly collect data relating to children.

Controller

Claire Joyce, trading as Contour Coaching, is the controller and responsible for your personal data (collectively referred to as “I”, “me” or “my”, in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact me using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact me. My full details are:

Claire Joyce; claire@contourcoaching.co.uk; Burlescombe, Tiverton, Devon.

Complaints

You have the right to make a complaint about how I handle your personal data. I care deeply about your data protection rights so please contact me first so I can try to resolve the problem for you.

Please contact me using the details above in the first instance, stating ‘Data Complaint’ in the subject heading of the email or letter. I will acknowledge your complaint within 30 days of receiving it. My data complaints policy is at the end of this document.

If you are not satisfied with the way I deal with your complaint, you can make a complaint to the data protection authority of the country in which you are based. In the UK, this is the Information Commissioner's Office (ICO) (www.ico.org.uk).

Your duty to inform us of changes

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your relationship with me.

Third-party links

My website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and am not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy policy or notice of every website you visit.

2. The data I collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

I may collect, use, store and transfer different kinds of personal data about you which I have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery or postal address, email address and telephone numbers.
- **Transaction Data** includes details about purchases of goods and services, including payments to and from you, card details and other details of products and services you have purchased from me.
- **Communication Data** includes any communications that you send to me whether through forms on our website or through email, text, WhatsApp, or any social media messaging or posting or any other type of communication that you might send to me.
- **Technical Data** includes internet protocol (IP) address, your log-in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from me and my third parties and your communication preferences.

I also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, I may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Sensitive Data

Sensitive data refers to data that includes details about your health, your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and criminal convictions and offences.

In the course of coaching, you may choose to share information relating to your wellbeing, emotional state or personal circumstances. This may constitute sensitive personal data. I only

process this information with your explicit consent and solely for the purpose of providing coaching services. When you submit your details, I will ask you to confirm your explicit consent to this processing.

Automated Processing

We do not carry out automated decision making or any type of automated profiling.

3. How is your personal data collected?

I use different methods to collect data from and about you including through:

- **Direct interactions.** You may give me your Identity, Contact and Transaction Data by filling in forms or by corresponding with me by post, phone, email or otherwise. This includes personal data you provide when you (where applicable):
 - apply for my products or services;
 - create an account on my website;
 - subscribe to my service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give me some feedback or contact me.
- **Automated technologies or interactions.** As you interact with my website, I may automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using cookies and other similar technologies. Please see my Cookie Policy for more details; this can be found via the footer links on each page of my website at www.contourcoaching.co.uk.
- **Analytics** I may receive technical personal data about you from analytics providers such as Google.
- I may receive Contact and Transaction Data from providers of technical, payment and delivery services such as Paypal or Stripe.

4. How I use your personal data

I will only use your personal data when the law allows me to. Most commonly, I will use your personal data in the following circumstances:

- Where I need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where I need to comply with a legal or regulatory obligation.
- To keep you updated about my products and services where you have consented to this or it is within our legitimate interest to do so. We shall send this information to you by email. You have the right to withdraw your consent to marketing at any time by sending me an email to: claire@contourcoaching.co.uk.

Purposes for which I will use your personal data

I have set out below, in a table format, a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what my legitimate interests are where appropriate.

Note that I may process your personal data for more than one lawful ground depending on the specific purpose for which I am using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to me	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to recover debts due to me)
(a) Notifying you about changes to my terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for my legitimate interests (to keep my records updated and to study how customers use my products/services)
To enable you to take part in a promotion or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage	(a) Performance of a contract with you (b) Necessary for my legitimate interests (to study how customers

	(e) Marketing and Communications	use my products/services, to develop them and grow my business)
To administer and protect my business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for my legitimate interests (for running my business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising I serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for my legitimate interests (to study how customers use my products/services, to develop them, to grow my business and to inform my marketing strategy)
To use data analytics to improve my website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for my legitimate interests (to define types of customers for my products and services, to keep my website updated and relevant, to develop my business and to inform my marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for my legitimate interests (to develop my products/services and grow my business)

Marketing

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. My lawful ground for processing your personal data to send you

marketing communications is either your consent or my legitimate interests (namely to grow my business) or my recognized legitimate interests (for direct marketing).

Under the Privacy and Electronic Communications Regulations, I may send you marketing communications if (i) you made a purchase or asked for information from me about my goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, I may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from me at any time.

Promotional offers from me

I may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what I think you may want or need, or what may be of interest to you. This is how I decide which products, services and offers may be relevant for you (I call this marketing).

You will receive marketing communications from me if you have requested information from me or purchased goods or services from me and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

I will get your express opt-in consent before I share your personal data with any third party for marketing purposes. I do not share your personal data with any third parties for their own marketing purposes.

Opting out

You can ask me or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting me by email at: claire@contourcoaching.co.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to me as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie policy; this can be found via the footer links on each page of my website at www.contourcoaching.co.uk.

Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose.

Please note that I may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

I may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- External Third Parties such as service providers, professional advisers, HMRC, government bodies and regulators; and
- Third parties to whom I may choose to sell, transfer, or merge parts of my business or assets. Alternatively, I may seek to acquire other businesses or merge with them. If a change happens to my business, then the new owners may use your personal data in the same way as set out in this privacy policy.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow my third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

I do not transfer your personal data outside the European Economic Area (EEA) and/or the UK.

7. Data security

I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions and they are subject to a duty of confidentiality.

I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Personal Data and AI

I shall only submit personally identifiable client data into AI platforms to the extent that such submission complies with GDPR and any other applicable legislation. I shall implement appropriate safeguards and comply with applicable data protection laws whenever I use AI.

9. Data retention

How long will you use my personal data for?

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. I may retain your personal data for a longer period in the event of a complaint or if I reasonably believe there is a prospect of litigation in respect to my relationship with you.

To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

By law I have to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see 'Request erasure' below for further information.

If you are not a customer, I shall retain your data for a period of 2 years following your last engagement with me.

In some circumstances I may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case I may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact me by email at:

claire@contourcoaching.co.uk.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, I may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, I may refuse to comply with your request in these circumstances.

Changes to this privacy policy

I may change this privacy policy from time to time – when I do I shall inform you via my website.

Data Complaints Policy

1. I am committed to providing a high-quality service, in accordance with data protection law. At all times, I seek to comply with data protection principles by ensuring I:

- process personal data lawfully, fairly and in a transparent way;
- collect personal data for specific and legitimate purposes and do not process personal data in a way that is incompatible with those purposes;
- collect and use adequate, relevant and minimal personal data;
- take reasonable steps to make sure personal data is accurate and kept up to date;
- do not keep personal data longer than necessary; and
- implement appropriate security measures.

2. I acknowledge that I may not always get things right, so if something has gone wrong, I need you to tell me. This will help me to improve my standards of service and data protection controls.

3. How to make a complaint

3.1. You can contact me in writing (by email to the following email address: claire@contourcoaching.co.uk) using the words 'Data Complaint ' in the subject heading. Alternatively you can send a letter to the postal address set out in my Privacy Policy.

4. Acknowledging and verifying your complaint

4.1. I will contact you within 10 days acknowledging your complaint.

4.2. I will take reasonable steps to verify the identity of the person making the complaint. This may involve requesting further information or documentation from you. If the complaint is made on behalf of someone else, I will also need to check that the person making the complaint is properly authorised to do so.

4.3. If, having requested additional information, I am not in a position to identify the person making the complaint or I am not satisfied that they have proper authority to make the complaint, I may refuse to deal with it - see section 7.2.1 below.

5. Investigating your complaint

- 5.1. I will investigate your complaint. This will usually involve:
 - 5.1.1. reviewing your complaint;
 - 5.1.2. locating and reviewing the records I hold about you;
 - 5.1.3. establishing the relevant facts; and
 - 5.1.4. liaising with individuals who you may have dealt with.
- 5.2. I may also need to ask you for further information or documents. If so, I will ask you to provide the information within a specific period of time.
- 5.3. I will update you on the progress of your complaint at appropriate times.

6. Notifying you of the outcome of our investigation

- 6.1. I will contact you at the end of our investigation to tell you what I have done and what I propose to do to resolve your complaint.
- 6.2. I usually aim to do this within 30 days of the date of receiving your complaint. However, this time period may be extended where:
 - 6.2.1. I ask you to provide further information to verify your identity or your authority to make the complaint, or in relation to the complaint itself;
 - 6.2.2. your complaint is complex or involves locating and/or reviewing a large volume of information; or
 - 6.2.3. you have made several complaints, which we need to investigate at the same time.
- 6.3. I will tell you if I need more time to properly investigate your complaint and explain why.

7. Refusing to deal with your complaint or charging a fee

- 7.1. I prefer to deal with complaints and, preferably, to resolve them. I will not usually charge a fee for handling a complaint.
- 7.2. I may, however, refuse to deal with a complaint where:
 - 7.2.1. after requesting additional information in accordance with section 4.2, I am not in a position to identify you and/or to verify that you are authorised to make the complaint; or
 - 7.2.2. I have asked for more information in relation to the complaint itself (section 5.2), but you have not provided this within a reasonable time.

7.3. Where I consider the complaint to be manifestly unfounded or excessive, e.g. because you have made the same complaint repeatedly, I may:

7.3.1. refuse to act on the complaint; or

7.3.2. charge a reasonable fee for dealing with the complaint, based on my reasonable administrative costs - I will notify you of the proposed fee in advance of incurring it.

8. What to do if we cannot resolve your complaint

8.1. If you are unhappy with the outcome of your complaint, you can complain to the data protection authority of the country where you are based. In the UK this is the Information Commissioner's Office (ICO), or you can seek to take action in the courts.

8.2. The ICO's contact details are:

Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Helpline number	0303 123 1113

More details on how to complain to the ICO are available on the [Complaints page](#) of the ICO's website. You should usually submit your complaint to the ICO or other data protection authority within three months of your last contact with me.