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Privacy Policy

Introduction

Blueprint Coach provides a professional coaching service, relationships with clients will always be built on transparency, trust and confidence in each other. Confidentiality will always be paramount. Blueprint Coach's privacy statement provides details for how the business is following personal data protection laws.

Blueprint Coach has written this statement to inform you that the business is committed to protecting the privacy and security of your personal information.

This privacy notice describes how Blueprint Coach will collect and use personal information about you both during and after using the service, in accordance with the General Data Protection Regulation (GDPR) and UK GDPR.

This notice applies to:

1. All Clients
2. All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business.

Any reference to 'we', 'us', 'our', 'the business' shall mean Blueprint Coach. Any reference to 'you' or 'Data Subject' shall mean any individual for whom the business holds personal data.

This Privacy Policy also applies to the website www.blueprintcoach.co.uk

In most circumstances your data will be held by Paul Ryves as a "Data Controller". The Data Controller is responsible for deciding how he holds and uses personal information about you. He is required under data protection legislation to notify you about the holding of information in this privacy notice. The Data Controller may update this notice at any time.

It is important that you read this notice, together with any other privacy notice Blueprint Coach may provide on specific occasions when the business is collecting or processing personal information about you, so that you are aware of how and why Blueprint Coach are using such information.

Data Protection Principles

Blueprint Coach will comply with data protection laws including General Data Protection Regulation ('GDPR'). This says that the personal information Blueprint Coach holds about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes Blueprint Coach have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only if necessary for the purposes Blueprint Coach have told you about.
6. Kept securely.

The kinds of information Blueprint Coach hold about clients

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).

There are "special categories" of more sensitive personal data which require a higher level of protection. Blueprint Coach will collect, store, and use the categories of personal information about my clients which include the following:

- Personal contact details such as name, title, telephone numbers, and email addresses.

Blueprint Coach may collect, store, and use the categories of personal information about clients following some coaching interventions which include the following:

- Marital status and dependants.
- Location of employment or workplace.
- Date of birth.
- Information about your health, medical conditions, or disabilities.

Why Blueprint Coach holds information on clients

It is necessary for Blueprint Coach to retain data on clients in order to fulfil contractual obligations, in line with the client's consent, and to hold data for legitimate business needs. Blueprint Coach will only retain data which we reasonably require and for a period which is reasonably necessary.

Blueprint Coach will not disclose your data to the third parties unless you have consented or the business is required to do so, either contractually or under another law or enactment.

How Blueprint Coach Collects Personal Information

Blueprint Coach collects personal information about clients directly from themselves when clients contact the business via telephone, email, social media or the Blueprint Coach website.

Client and business data is stored within a GDPR compliant Microsoft account on a computer which is encrypted. Data is stored in the UK/EU. Data on current clients that Blueprint Coach is actively working with is also stored in the Data Controller's mobile telephone that is also password encrypted.

Blueprint Coach reserves the right to change the systems in which data is stored without notification to another equivalent system. However, at all times Blueprint Coach will ensure the appropriate security of your data and GDPR compliance.

How Blueprint Coach Will Use Your Information.

Blueprint Coach will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contracted service we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Blueprint Coach may also use your personal information in the following situations, which are likely to be rare:

1. When necessary to protect your interests (or someone else's interests).
2. Where it is needed in the public interest (or for official purposes).

Situations in which Blueprint Coach will use your personal information

Blueprint Coach requires all the categories of information, listed above, primarily to allow the business to perform contracted services with you and to enable Blueprint Coach to comply with legal obligations. In some cases, Blueprint Coach may use your personal information to pursue the business's legitimate interests or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which Blueprint Coach will process your personal information are listed below.

- Administering the contract Blueprint Coach has entered into with you.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To market other products or services which Blueprint Coach offer which may be of interest to you.
- To inform you of updates in the services Blueprint Coach provide.
- To administer business processes which may include disclosure of client data to the Blueprint Coach accountant.

Some of the above grounds for processing will overlap and there may be several grounds which justify use of your personal information.

In certain circumstances listed above, Blueprint Coach holds your data to market other services to you or send you relevant research and articles Blueprint Coach thinks may interest you. The business have a legitimate business interest in retaining your data for this purpose and will only send you such content if you have 'opted in'.

If you fail to provide personal information

If you fail to provide certain information when requested, Blueprint Coach may not be able to perform the contract the business has entered with you or may be prevented from complying with our legal obligations.

Change of purpose

Blueprint Coach will only use your personal information for the purposes for which the business collected it, unless we reasonably consider that we need to use it for another reason, which is compatible with the original purpose. If the business needs to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

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

The kind of information Blueprint Coach holds about individuals other than clients and how this data is used

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).

During Blueprint Coach day-to-day business, the business will acquire information regarding individuals other than clients and will retain this data where the business has a legitimate business reason to do so.

Typically, personal data on individuals, third parties and suppliers other than my clients is acquired in the following circumstances:

1. Where we have met individuals, third parties and suppliers at networking or other marketing events;
2. Where individuals, third parties or suppliers have made enquiries with Blueprint Coach regarding possible services but have not subsequently become clients of the business;
3. Where individuals, third parties or suppliers are acting in the capacity of providing services to Blueprint Coach;
4. Where Blueprint Coach have regular business-related dealings with you.

Blueprint Coach have a legitimate business interest in retaining this data to send research and articles, event details or other updates relating to our services or something that Blueprint Coach believe relates to your interests. You have the right to ask Blueprint Coach to erase or rectify your data and I will only send you such material if you have 'opted in' (and you can 'opt out' at any later time').

Why Blueprint Coach might share your personal information with third parties

Blueprint Coach will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where Blueprint Coach have another legitimate interest in doing so.

Data Security

Blueprint Coach have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures may be obtained directly from the Data Controller, Paul Ryves: paul@blueprintcoach.co.uk

Blueprint Coach have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where the business is legally required to do so.

The transmission of information via the internet is not completely secure. Blueprint Coach cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with Blueprint Coach by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

Data Retention

How long will Blueprint Coach use your information for?

Blueprint Coach will only retain your personal information for as long as necessary to fulfil the purposes the business collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, Blueprint Coach will 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 the business process your personal data and whether we can achieve these through other means, and the applicable legal requirements.

In some circumstances Blueprint Coach may anonymise your personal information so that it can no longer be associated with you, in which case the business may use such information without further notice to you.

In respect of client data, you can expect Blueprint Coach to hold data relating to your instructions for a period of seven years after completion of the last coaching interaction. The reason for this is that the Limitation Act 1980 typically provides that legal proceedings for breach of contract or negligence can be brought up to six years after the events. Blueprint Coach therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings ensue.

Given the nature of Blueprint Coach services clients often return with repeat instructions within weeks, months or years of contacting me in the first instance. The seven-year period referred to above will start from the last contact Blueprint Coach had with the client, third party or supplier, to ensure we are able to assist as and when we need to. Should you not contact the business for seven years, Blueprint Coach will confidentially destroy all data held for you.

Rights of access, correction, erasure, and restriction

Your duty to inform me of changes

It is important that the personal information Blueprint Coach holds about you is accurate and current. Please keep the business informed if your personal information changes during our working relationship.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information Blueprint Coach holds about you and to check that the business is lawfully processing it.
- **Request correction** of the personal information that Blueprint Coach holds about you. This enables you to have any incomplete or inaccurate information the business holds about you corrected.
- **Request erasure** of your personal information. This enables you to ask Blueprint Coach to delete or remove personal information where there is no good reason for the business to continue to process it. You also have the right to ask Blueprint Coach to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where Blueprint Coach is relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where Blueprint Coach is processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask Blueprint Coach to suspend the processing of personal information about you, for example if you want the business to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that Blueprint Coach transfer a copy of your personal information to another party, please contact me at paul@blueprintcoach.co.uk

Please note that where you ask Blueprint Coach to erase, correct, object to process or seek to restrict processing of data the business may refuse your request where we have a legal obligation, contractual or other legitimate business interest to refuse your request. If Blueprint Coach refuses your request, we will notify you of this refusal and you will have the right to appeal.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, Blueprint Coach may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, the business may refuse to comply with the request in such circumstances.

What Blueprint Coach may need from you

Blueprint Coach may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact paul@blueprintcoach.co.uk. Once Blueprint Coach have received notification that you have withdrawn your consent, the business will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Privacy Manager

Paul Ryves is Blueprint Coach's appointed Data Privacy Manager responsible for overseeing compliance with this privacy policy. If you have any questions about this privacy policy or how Blueprint Coach handle your personal information, please contact Paul Ryves at paul@blueprintcoach.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: <https://ico.org.uk/make-a-complaint/>

Cookies Policy

Blueprint Coach's website does not use cookies as part of the user website experience. Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website]. www.blueprintcoach.co.uk is transparent and free of any data tracking including Google Analytics.

Unfortunately, Blueprint Coach cannot guarantee that your user experience will be totally free from Cookies, data tracking or data analytics if you found the website via a third-party website or search engine.

Other cookies may be stored to your computer's hard drive by external vendors if the website uses referral programmes, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

Changes to this privacy notice

Blueprint Coach reserves the right to update this privacy policy at any time and will provide a new privacy notice when the business makes any substantial updates. Blueprint Coach may also notify you in other ways from time to time about the processing of your personal information.

Contact and further information

If you have any questions about this privacy policy or wish to submit a complaint, then please email paul@blueprintcoach.co.uk

You have the right to make a complaint to the Information Commissioners Office or such other regulatory body or supervisory authority as may be appointed from time to time.

If you make a complaint, Blueprint Coach will respond to let you know how your complaint will be handled.