

ND Transformative Coaching – Data Retention Schedule (Revised 2026)

Applies to all client, enquiry, and administrative data processed by ND Transformative Coaching.

1. Purpose of This Schedule

This schedule sets out:

- what personal data is collected
- where it is stored
- the lawful basis for processing
- how long it is retained
- how and when it is deleted
- which third parties process data on my behalf

It applies to all clients, prospective clients, and members of the public who make enquiries.

2. Storage Systems Used

Personal data may be stored in:

- Notion CRM (password-protected workspace; MFA enabled; hosted in the US under SCCs)
- Secure cloud storage (password-protected folders)
- Email account (password + MFA)

- Mobile phone (biometric/PIN protected)
- Banking app (biometric/PIN protected)

3. Personal Data Retention Table

3.1 Core Client Data

Data Type	Where Stored	Retention Period	Lawful Basis	Action at End of Retention
Client Name	Notion CRM; Client Log	7 years	Contract; Legitimate interest (legal defence)	Deleted from Notion and Client Log
Client Date of Birth	Coaching Agreement folder	7 years	Contract; Legitimate interest	Deleted from secure cloud storage
Client Address	Coaching Agreement folder	7 years	Legitimate interest	Deleted from secure cloud storage
Client Email Address	Notion CRM; Email account	6 months after contract end	Contract	Deleted from Notion and email
Client Phone Number	Notion CRM; Client Notes	Duration of contract	Contract	Deleted from Notion and phone records

3.2 Administrative CRM Data

Data Type	Where Stored	Retention Period	Lawful Basis	Action
Coaching Status (active/paused/completed)	Notion CRM	7 years	Legitimate interest	Deleted from Notion
Date of Exploration Call	Notion CRM	6 months if not a client; 7 years if they become a client	Pre-contract steps; Legitimate interest	Deleted from Notion
Initial Response Email Sent (Yes/No)	Notion CRM	6 months (non-clients); 7 years (clients)	Legitimate interest	Deleted from Notion
ATW or Private Client Status	Notion CRM	7 years	Contract; Legitimate interest	Deleted from Notion
Number of Sessions Booked	Notion CRM	7 years	Contract	Deleted from Notion
Coaching Agreement Sent / Signed / Returned (status only)	Notion CRM	7 years	Contract; Legitimate interest	Deleted from Notion
ND Guides / Resources Sent	Notion CRM	7 years	Contract	Deleted from Notion
Start Date of Coaching Sessions	Notion CRM	7 years	Contract	Deleted from Notion
Invoice Sent / Invoice Paid (metadata)	Notion CRM; Email	6 years (HMRC)	Legal obligation	Deleted from Notion and email

Data Type	Where Stored	Retention Period	Lawful Basis	Action
Data Removal Date	Notion CRM	Until deletion of associated record	Legal obligation	Deleted with record
Date of Last Interaction	Notion CRM	6 months (non-clients); 7 years (clients)	Legitimate interest	Deleted from Notion
Non-confidential Admin Notes	Notion CRM	7 years	Legitimate interest	Deleted from Notion

3.3 Client Notes, Emails, and Communications

Data Type	Where Stored	Retention	Basis	Action
Client Notes (coaching)	Secure cloud storage	7 years	Contract; Legitimate interest	Deleted
Client Emails	Email account	6 months after contract end	Contract	Deleted
Emails relating to disputes or abusive behaviour	Email; Notion CRM	7 years	Legitimate interest (legal defence)	Deleted

3.4 Recordings and Transcripts

Data Type	Where Stored	Retention	Basis	Action
Session Recordings	Secure cloud storage	6 months	Explicit consent	Deleted

Data Type	Where Stored	Retention	Basis	Action
Session Transcripts	Secure cloud storage	6 months	Explicit consent	Deleted

3.5 Testimonials

Data Type	Where Stored	Retention	Basis	Action
Client Testimonies	Secure cloud storage	3 years	Explicit consent	Removed from marketing; file deleted

3.6 Enquiries (Non-Clients)

Data Type	Where Stored	Retention	Basis	Action
Email Address of Enquirer	Email account; Notion CRM (if logged)	6 months	Pre-contract steps	Deleted
Enquiry Emails	Email account	6 months	Pre-contract steps	Deleted

3.7 Financial Data

Data Type	Where Stored	Retention	Basis	Action
Bank Details (refunds only)	Email; Banking app	Deleted once refund processed	Contract	Deleted

4. Special Category Data

Special category data is only recorded when necessary for high-quality coaching.

Data Type	Where Stored	Retention	Basis	Action
Health-related information	Client notes; recordings/transcripts (if consented)	7 years	Contract; Legitimate interest; Article 9(2)(f) legal claims	Deleted
Other sensitive data (e.g., ethnicity, beliefs, sexual orientation)	Client notes; recordings/transcripts (if consented)	7 years	Contract; Legitimate interest; Article 9(2)(f)	Deleted
Preferred Pronouns	Client notes	Duration of contract	Contract; Explicit consent	Deleted

5. Third-Party Processors

Processor	Data Processed	Retention	Basis
Notion Labs Inc.	All CRM data	Matches retention periods above	Contract; Legitimate interest; SCCs for international transfer
Monzo Bank	Financial data	Up to 10 years	Contract; Legal obligation; Legitimate interest
Ionos	Website usage data	As per Ionos policy	Contract

6. International Transfers

Notion stores data on servers located in the United States. Transfers are protected using Standard Contractual Clauses (SCCs). Access is restricted via password and multi-factor authentication.

7. Data Subject Rights

Clients and enquirers may request:

- access to their data

- correction of inaccurate data
- deletion (where applicable)
- restriction of processing
- portability (where applicable)
- withdrawal of consent

Requests are responded to within one month.

8. Data Breach Procedure

A data breach is any accidental or unlawful loss, access, disclosure, or alteration of personal data.

If a breach occurs:

1. The risk to individuals is assessed immediately.
2. If required, the ICO is notified within 72 hours.
3. Affected individuals are informed where there is a high risk to their rights or freedoms.
4. Steps are taken to prevent recurrence.

9. Automated Decision-Making

No automated decision-making or profiling is carried out.

10. Children's Data

Services are not provided to individuals under 18. No children's data is processed.

11. Deletion Process

When data reaches the end of its retention period:

- it is deleted from Notion (including permanent deletion after Notion's 30-day trash period)
- files are removed from secure cloud storage
- emails are deleted from the email account
- mobile phone records are deleted where applicable

Privacy Policy available at <https://www.ndtransformativecoaching.co.uk/privacy-policy/>