

ND Transformative Coaching Data Retention Schedule

Personal Data

Data Type	Where Stored	How long held	Basis	Action taken at end of retention period
Client Name	Client Log (Password protected file in secure cloud storage)	7 years	Contract: During the course of the contract, as this is needed in order to provide a coaching service. Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim. Retaining the client name assists me in demonstrating that the client data I hold (including client notes) refer to the client making any such claim.	Deleted from the Client Log.
Client DOB	Client Coaching Agreement (Password protected folder in secure cloud storage)	7 years	Contract: During the course of the contract, as this is required in order to ensure that I am suitably qualified and insured to provide you with coaching services. Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim. Retaining the client DOB assists me in demonstrating that the client data I hold (including client notes) refer to the client making any such claim and that I was suitably	File deleted from secure cloud storage.

			qualified and insured to provide coaching services to the client at the time.	
Client Address	Client Coaching Agreement (Password protected folder in secure cloud storage)	7 years	Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim. Retaining the client address assists me in demonstrating that the client data I hold (including client notes) refer to the client making any such claim.	File deleted from secure cloud storage.
Client Notes	Client Notes (Password protected file in secure cloud storage)	7 years	Contract: Used to provide high quality coaching services. Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim.	File deleted from secure cloud storage.
Client Email address	Client Log (Password protected file in secure cloud storage) Email Account (password protected)	6 months after the end of the contract	Contract: Used to provide client with the link for sessions and for any additional information during the course of the contract. Retained for 6 months from end of contract in order to answer any additional enquiries.	Deleted from Client Log and Email Account.

Client Emails	Email Account (password protected)	6 months after the end of the contract	Contract: Used to provide client with the link for sessions and for any additional information during the course of the contract. Retained for 6 months from end of contract in order to answer any additional enquiries.	Deleted from Email Account
Client Email address in the case of any dispute or any abusive or inappropriate emails	Client Log (Password protected file in secure cloud storage) Email Account (password protected)	7 years	Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence or breach of contract and require the data in order to assess and defend any such a claim.	Deleted from Client Log.
Client Emails in the case of any dispute or any abusive or inappropriate emails	Email Account (password protected)	7 years	Legitimate interest As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence or breach of contract and require the data in order to assess and defend any such a claim.	Deleted from Email Account.
Client Phone number	Client Notes (Password protected file in secure cloud storage)	Duration of contract	Contract: Used in case of an emergency during a session or if there are technical difficulties with connection, in order to ensure a high quality of service.	Deleted from Client Notes. Deleted from Mobile Phone record where applicable.

	Mobile Phone call record if a call is made (Biometric and/or PIN protected)			
Recordings of sessions	Recordings and Transcripts Folder (Password protected folder in secure cloud storage)	6 months	Consent: Consent specifically asked for if a session is to be recorded and transcribed for use in assessment, supervision or mentoring. Consent is optional and the session will still go ahead whether or not consent for the recording is provided. Consent can be withdrawn at any time during or after the recording.	File deleted from secure cloud storage.
Transcripts of sessions	Recordings and Transcripts Folder (Password protected folder in secure cloud storage)	6 months	Consent: Consent specifically asked for if a session is to be recorded and transcribed for use in assessment, supervision or mentoring. Consent is optional and the session will still go ahead whether or not consent for a transcript is provided. Consent can be withdrawn at any time during or after the recording and transcription.	File deleted from secure cloud storage.
Client Testimonies	Reviews & Testimonies Folder in secure cloud storage	3 years	Consent: Consent specifically requested for use of a review or testimony in publicity and marketing. Consent can be withdrawn at any time. If this occurs, the testimony will be withdrawn from online use and will not be used on future physical marketing resources. Any	Withdrawn from marketing. File deleted from secure cloud storage.

			physical marketing resources that have already been produced using the testimony that are still in my possession will be destroyed unless the client specifically consents for them to be used up.	
Email Address of Members of Public making an enquiry	Email Account (password protected)	6 months	Contract: Used to assist with and respond to enquiries from members of public enquiring through website or directly by email. This information is required in order to respond to their enquiry (including any further requests for information or clarification).	Deleted from Email Account
Enquiry Emails from Members of Public	Email Account (password protected)	6 months	Contract: Used to assist with and respond to enquiries from members of public enquiring through website or directly by email. This information is required in order to respond to their enquiry (including any further requests for information or clarification).	Deleted from Email Account
Bank Account details	Email Account (Password protected) Banking App (Password and Biometrics protected)	Only collected if a refund is being made. Deleted once refund has been processed.	Contract: Provided by the client via email if a refund is due and used in the provision of high quality coaching services and fulfilment of the coaching agreement terms.	Deleted from Email Account and Banking App once refund has been processed.

Special Categories (Sensitive) Data

Data Type	Where Stored	How long held	Basis	Action taken at end of retention period
Health data	<p>Possible storage in: Client notes</p> <p>Recordings and Transcripts (if consent given for these)</p>	7 years	<p>Such data will only be recorded if necessary and relevant in the provision of high quality coaching services. The minimum detail required to provide such services will be recorded. If it is not relevant in this way, it will not be recorded even if mentioned by the client.</p> <p>Article 6 Basis: Contract: Required for the provision of high quality coaching services. Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim. This data will be stored in order to demonstrate if required at a later date the provision of high quality coaching services.</p> <p>Article 9 Basis: Article 9 (2) (f) – Legal Claims and Judicial Acts: This data is kept as part of client notes in order to establish, exercise or defend legal claims. ‘Legal claims’ in this context is not limited to current legal proceedings. It includes processing necessary for:</p>	Files deleted from secure cloud storage.

			<ul style="list-style-type: none"> • actual or prospective court proceedings; • obtaining legal advice; or • establishing, exercising or defending legal rights in any other way. 	
<p>Sensitive data potentially including personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; health; a person's sex life; a person's sexual orientation.</p>	<p>Possible storage in:</p> <p>Client notes</p> <p>Recordings and Transcripts (if consent given for these)</p>	7 years	<p>Such data will only be recorded if necessary and relevant in the provision of high quality coaching services. The minimum detail required to provide such services will be recorded. If it is not relevant in this way, it will not be recorded even if mentioned by the client.</p> <p>Article 6 Basis:</p> <p>Contract: Required for the provision of high quality coaching services.</p> <p>Legitimate interest: As a service provider I have a legitimate interest in holding and processing personal client data because I am entitled to defend myself against claims for professional negligence and require the data in order to assess and defend any such a claim. This data will be stored in order to demonstrate if required at a later date the provision of high-quality coaching services.</p> <p>Article 9 Basis:</p> <p>Article 9 (2) (f) – Legal Claims and Judicial Acts:</p>	Files deleted from secure cloud storage.

			<p>This data is kept as part of client notes in order to establish, exercise or defend legal claims. 'Legal claims' in this context is not limited to current legal proceedings. It includes processing necessary for:</p> <ul style="list-style-type: none"> • actual or prospective court proceedings • obtaining legal advice • establishing, exercising or defending legal rights in any other way. 	
Preferred pronouns	Client notes	Duration of contract	<p>Article 6 Basis: Contract: Included in initial client notes if client chooses to state these and used in the provision of high quality coaching services. Can be deleted from client notes upon request.</p> <p>Article 9 Basis: Article 9 (2) (a) Explicit Consent: Included in client notes if client gives explicit consent for it to be recorded in this way in order to provide high quality coaching services.</p>	Files deleted from secure cloud storage.

Data Processed on my Behalf by Third Parties

Data Type	Processor	How long held	Basis
Financial data including bank details	Monzo Bank	Up to 10 years after the closure of my bank account	Contract: Required for the provision of financial services including bank transfers. Legitimate interest: Required in order for Monzo to manage their business and financial affairs and to protect their customers, employees and property. It is in their interests to ensure that their processes and systems operate effectively and that they can continue operating as a business. For further information, please refer to Monzo's Privacy Policy.
Website use	Ionos		Contract: Used in order to enhance website functionality and performance in order to provide a high-quality user-experience.