# **Noctiluca Privacy Policy**



### Our contact details

Name: Lois Calder Address: 70 New wynd, Montrose, Angus, Scotland, UK DD108RF Phone Number:+44 (0)7876 765945 E-mail: <u>lois@noctiluca.co.uk</u> Website: <u>www.noctiluca.co.uk</u> Date of Privacy Policy: 1<sup>st</sup> April 2024

## The type of personal information we collect

We currently collect and process the following information:

- Name
- Email address
- Phone number
- Address (Personal and/or Organisational)
- Financial information

#### How we get the personal information and why we have it

The personal information we process is provided to us directly by you for one of the following reasons:

- For the purposes of delivery of personal and business coaching, training and education.
- For processing payments for these services.

We use the information that you have given us in order to:

- Deliver coaching, training and education services, as agreed with you.
- Receive payment.

In addition, to maintain International Coaching Federation (ICF) professional accreditation, we are required to share limited client information (name, email, coaching hours) with the ICF, in the form of 'attestation of coaching experience'. The ICF may contact you to confirm that the engagement took place. We will keep data for this purpose for a maximum of 3 years, and the ICF will delete all submitted data 6 months after an accreditation application. Further information regarding the ICF policy on data security can be accessed here: https://coachingfederation.org/blog/icf-announces-credentialing-process-updates-toenhance-data-security

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a) Your consent. You are able to remove your consent at any time. You can do this by contacting <u>lois@noctiluca.co.uk</u>
- b) We have a contractual obligation.
- c) We have a legal obligation.
- d) You have a vital interest and wish to know more about our services.
- e) We need it to deliver the service of coaching.
- f) We have a legitimate interest.
- g) We will not share your date with third party organisations or individuals.

#### How we store your personal information

Your information is stored in secure a cloud storage location, with additional password protection.

We will retain your name and contact details for 1 year for following the termination of a coaching agreement, unless you are subscribed to one of our services.

We will then dispose of your information by deleting all digital data and records, and by shredding and responsible disposal of any confidential hard copy information.

The exception to this is to retain limited information (name, email, coaching hours) for a period of up to 3 years, for the purposes of renewing ICF professional coaching accreditation.

#### Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Lois@noctiluca.co.uk if you wish to make a request.

#### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us by email at lois@noctiluca.co.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk