

## PRIVACY POLICY 2026

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### 1. Introduction

Carver Coaching Ltd ("we", "our", "us") is committed to protecting and respecting your privacy.

We process personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Applicable UK data protection legislation

We are registered with the Information Commissioner's Office (ICO) as a data controller.

### 2. Who We Are

Carver Coaching Ltd

Company Number: 13056043

Registered in England and Wales

Registered Office: Albany House, Claremont Lane, Esher, Surrey, KT10 9FQ

ICO Registration Number: ICO:00017920741

Contact: [lisa@carvercoaching.co.uk](mailto:lisa@carvercoaching.co.uk)

### 3. The Personal Data We Collect

We may collect and process:

#### a) Website & Enquiry Data

- Name
- Organisation
- Email address
- Phone number
- IP address
- Website usage data (via cookies)

#### b) Client & Programme Data

- Names and job titles
- Work contact details
- Attendance records
- Evaluation and feedback information

#### c) Coaching Client Data

- Contact information
- Coaching objectives
- Session notes
- Development reflections
- Feedback reports

In some circumstances, coaching conversations may include sensitive personal data (for example, health or wellbeing information). Where this occurs, such data is handled with strict confidentiality and processed lawfully.

#### **d) Associate & Contractor Data**

- CVs
- Contact details
- Bank details
- Contractual documentation

#### **e) Financial Records**

- Invoices
- Payment records

### **4. Lawful Basis for Processing**

We rely on the following lawful bases:

- **Contract** – to deliver coaching and organisational development services
- **Legitimate Interest** – to manage client relationships and improve services
- **Legal Obligation** – for financial record keeping
- **Consent** – for marketing communications
- **Explicit Consent** – where special category data is processed

### **5. How We Use Personal Data**

We use personal data to:

- Deliver coaching and organisational development services
- Administer leadership programmes
- Communicate with clients and participants
- Issue invoices and manage payments
- Improve our services
- Comply with legal obligations

We do not sell personal data.

### **6. Data Sharing**

We may share personal data with trusted third-party processors including:

- IT and cloud service providers
- Secure communication platforms
- Accounting and payment providers
- Digital signature platforms
- Survey and evaluation platforms (where applicable)

All processors are subject to appropriate data processing agreements.

We only share personal data where necessary and proportionate.

### **7. International Transfers**

Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place in accordance with UK GDPR, including adequacy regulations or standard contractual clauses.

### **8. Data Security**

We implement appropriate technical and organisational measures including:

- Encrypted devices
- Multi-factor authentication
- Secure cloud storage
- Restricted access controls
- Confidentiality agreements with associates
- Secure disposal of records

## 9. Data Retention

We retain personal data only as long as necessary:

- Coaching records: up to 24 months post-completion (unless contractually required otherwise)
- Financial records: minimum 6 years
- Marketing data: until consent withdrawn
- Recruitment data: up to 12 months

## 10. Your Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction
- Request erasure
- Restrict processing
- Object to processing
- Request data portability

Requests can be made by contacting us at [lisa@carvercoaching.co.uk](mailto:lisa@carvercoaching.co.uk).

You also have the right to lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

## 11. Cookies

Our website uses cookies to enhance user experience and analyse site traffic. Please refer to our Cookie Policy for further details.

## 12. Updates

This policy may be updated periodically. The latest version will always be available on our website.

Signed:



**Name: LISA MARTIN, MANAGING DIRECTOR OF CARVER COACHING LTD**

**Dated: January 11th, 2026**