

## CYBER SECURITY STATEMENT 2025

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This Carver Coaching Ltd confirms that the following technical and organisational measures are in place for all contracts to ensure the secure processing, storage and transmission of personal data and confidential information.

### **1. Technical Measures**

#### **Encrypted and password-protected devices:**

All laptops and mobile devices used for client work are encrypted (e.g., BitLocker, FileVault, iOS hardware encryption) and secured with strong passwords or biometrics.

#### **Multi-factor authentication (MFA):**

MFA is enabled on all accounts and cloud systems used to access or store client data.

#### **Anti-virus and malware protection:**

All devices have up-to-date antivirus, firewall and malware protection installed and updated regularly.

#### **No use of unencrypted removable media:**

Client data is never stored on unencrypted USB drives or removable storage devices.

#### **Secure electronic communication:**

All client correspondence and documents are shared through secure, password-protected email systems. Sensitive documents may be password-protected if required.

### **2. Organisational Measures**

#### **Data minimisation:**

Carver Coaching collects and processes only the personal data essential for delivering coaching and organisational development services.

#### **Restricted access:**

Access to personal data is limited strictly to the assigned coach. No other associates or staff can access this information.

#### **Pseudonymisation of coaching notes:**

Coaching notes are stored separately from identifying information. Notes are labelled using ID codes rather than names to prevent identification if accessed.

**Example:**

Folder 2: "Coaching Notes – Pseudonymised"

C001 – Session 1 Notes

C001 – Session 2 Notes

C002 – Session 1 Notes

If someone accessed this folder, they would not be able to determine whose notes they were.

**Confidentiality:**

A strict confidentiality policy is in place and forms part of the coaching contract with each coachee.

**Associate guidance:**

All associates receive clear guidance on GDPR-compliant practice and are contractually required to adhere to this.

**Data retention and secure deletion:**

Coaching notes are retained for 6 months following the completion of coaching, after which they are securely deleted or shredded. Evaluation data may be retained in anonymised form for service improvement.

**Breach reporting:**

Any suspected data breach must be reported immediately through Carver Coaching's internal procedure for investigation and response.

**No third-party sharing:**

Personal data is never shared with third parties unless legally required.

**3. Review**

This policy is reviewed annually or following significant organisational or legislative change.

**Signed:**

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

**Dated: January 10th, 2025**