

DATA PROTECTION, GDPR AND CONFIDENTIALITY POLICY

Corporate Wellbeing Coaching Limited

Effective Date: 8th June 202

1. Purpose

This policy explains how Corporate Wellbeing Coaching Limited collects, stores, processes and protects personal information when delivering coaching, wellbeing, stress management, training and organisational development services.

We are committed to complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and all applicable privacy legislation.

2. Data Controller

Corporate Wellbeing Coaching Limited

Contact:

Name: Carly

Email: info@corporatewellbeingcoaching.co.uk

Telephone: 07949 833687

Business Address: Tring, HP23 5HG

3. Information We Collect

We may collect:

Business Contact Information

- Name
- Job title
- Company name
- Email address
- Telephone number

Corporate Wellbeing Coaching Limited

Registered in England and Wales

Company number: 17259721

Registered office: Tring, Hertfordshire, HP23 5HG

www.corporatewellbeingcoaching.co.uk

info@corporatewellbeingcoaching.co.uk

- Business correspondence

Coaching and Wellbeing Information

- Coaching session notes
- Wellbeing assessments
- Stress assessment responses
- Workload assessments
- Workplace experience information
- Feedback forms
- Training participation records

We only collect information that is relevant to the services being provided.

4. Why We Collect Information

Information is collected to:

- Deliver coaching services
- Deliver wellbeing programmes
- Assess workplace wellbeing and stress levels
- Provide organisational recommendations
- Manage client relationships
- Arrange appointments and communications
- Improve service quality
- Meet legal and professional obligations

5. Lawful Basis for Processing

We process information under one or more of the following lawful bases:

Contract

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To fulfil our contractual obligations to clients and organisations.

Legitimate Interests

To operate and improve our coaching and consultancy services.

Consent

Where sensitive wellbeing information is collected through questionnaires, surveys or assessments.

Participants may withdraw consent at any time where consent is the lawful basis being relied upon.

6. Confidentiality

Confidentiality is a core principle of our services.

Information disclosed during coaching sessions or wellbeing assessments will remain confidential except where:

- The participant gives explicit permission for disclosure;
- Disclosure is required by law;
- There is a safeguarding concern;
- There is a serious risk of harm to the individual or others.

7. Employee Assessment and Survey Data

Where services are commissioned by an employer:

- Individual employee responses remain confidential.
- Employers will not receive identifiable individual responses.
- Reports will normally be provided in aggregated or anonymised format.
- Individual comments may be included only where they cannot reasonably identify the participant.

The purpose of questionnaires is to identify organisational trends, risks and opportunities for improvement, not to assess individual employee performance.

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8. Data Storage and Security

We take appropriate measures to protect personal information.

These include:

- Password-protected devices
- Secure cloud-based systems
- Encrypted business accounts where available
- Restricted access to information
- Secure disposal of paper records

Only authorised personnel have access to personal information.

9. Paper-Based Questionnaires

Where paper questionnaires are used:

- Completed forms are stored securely.
- Access is restricted.
- Information is analysed and incorporated into reports.
- Original forms are securely shredded when no longer required.

10. Digital Questionnaires

Where digital forms or survey platforms are used:

- Data is collected through GDPR-compliant systems where reasonably practicable.
- Access is restricted to authorised personnel.
- Information is processed solely for the agreed purpose.

11. Retention Periods

Unless a longer period is legally required:

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Record Type	Retention Period
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Business enquiries	Up to 24 months
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Client contracts	6 years
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Coaching notes	3 years
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Assessment questionnaires	12 months
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Anonymised reporting data As required for business records

Records are securely deleted or destroyed once no longer required.

12. Sharing Information

We do not sell, rent or trade personal information.

Information may be shared only with:

- Professional advisers
- Regulatory bodies where legally required
- Secure software providers assisting in service delivery

All third parties are expected to maintain appropriate security and confidentiality standards.

13. Individual Rights

Individuals have the right to:

- Access their personal information
- Correct inaccurate information
- Request deletion where appropriate
- Restrict processing
- Object to processing
- Withdraw consent

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- Lodge a complaint regarding the handling of their personal information
- Lodge a complaint with the Information Commissioner's Office (ICO)

14. Employee Questionnaire Consent Statement

To be included on all questionnaires:

"By completing this questionnaire, you consent to Corporate Wellbeing Coaching Limited collecting and processing the information you provide for the purpose of assessing wellbeing, stress levels, workload and workplace experiences.

Your individual responses will be treated confidentially and will not normally be disclosed to your employer in an identifiable form. Information may be combined with responses from other participants and presented in anonymised reports.

You may choose not to answer any question and may withdraw your participation at any time before data analysis has been completed."

15. Corporate Client Data Handling Statement

The organisation engaging Corporate Wellbeing Coaching Limited acknowledges that:

- Individual coaching conversations remain confidential.
- Individual questionnaire responses remain confidential.
- Organisational reports will normally contain anonymised and aggregated findings.
- The purpose of the service is organisational improvement and employee wellbeing.
- Personal information will be processed in accordance with UK GDPR requirements.

16. Data Protection Complaints Procedure

If you have concerns about how Corporate Wellbeing Coaching Limited has collected, stored, used or protected your personal information, you have the right to make a complaint.

Complaints may be submitted by:

Email: info@corporatewellbeingcoaching.co.uk

Telephone: 07949 833687

Post: Corporate Wellbeing Coaching Limited, Tring, HP23 5HG

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Please provide as much information as possible about your concern so that it can be investigated appropriately.

Upon receipt of a complaint:

- We will acknowledge receipt of your complaint within 30 days.
- We will investigate the matter fairly and impartially.
- We will keep appropriate records of complaints received, actions taken and outcomes.
- We will provide a response outlining our findings and any actions taken.

If you remain dissatisfied with our response, you have the right to raise your concerns with the Information Commissioner's Office (ICO).

The ICO can be contacted via their website at <https://ico.org.uk> or by telephone on 0303 123 1113.

17. Contact and Complaints

Questions regarding this policy should be directed to:

Carly

Corporate Wellbeing Coaching Limited

info@corporatewellbeingcoaching.co.uk

07949 833687

Corporate Wellbeing Coaching Limited, Tring HP23 H

Individuals who have concerns regarding the handling of their personal information are encouraged to use the Data Protection Complaints Procedure outlined above.

Policy Review

This policy will be reviewed annually and updated as required to reflect changes in legislation, regulatory guidance and business practices.

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