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*Dedicated to developing potential*

Part 1: Data we hold

	What do we hold?	Why do we hold it?	For how long?	What happens next?	How do we tell them?	Who might we share it with?
<b>Client Sensitive Data</b>	We hold client data (coaching notes, a range of psychometric results & strengths profiles)	To be able to use & recall information in and around coaching / developmental conversations	For the period when we are actively working together + 6 months	After this period all data (hard and soft copies) will be deleted	We tell clients this in their coaching contracts	No sensitive information is passed onto external contacts
<b>Client Contact Details</b>	We retain client contact details (email, address, mobile phone no; landline no; home address indefinitely)	To enable us to contact clients before, during and after we work with them	Indefinitely	Nothing, unless they ask to be forgotten in which case we comply within 48 hours	We tell clients this in their coaching / mentoring contracts.  Our privacy policy is referenced in our terms of business & published on our website	No information is passed onto external contacts, with the potential exception of their email address to OPP for MBTI reports.
<b>Potential Clients &amp; Sponsors</b>	We retain their contact details	To keep in touch	Indefinitely	Nothing, unless they ask to be forgotten in which case we comply within 48 hours	We get their permission as part of our initial discussion	Nobody



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#### Part 2: [How do we hold data?](#)

Our digital data is held securely on two password protected computers and a mobile phone, backed up digitally every day. Our paperwork is held in a filing cabinet that is locked.

#### Part 3: [Response Strategy](#)

We will do everything possible to avoid or minimise the impact of any breach of privacy.

In the unlikely event of a breach then we commit to :

- Within 72 hours, contacting the person whose details have been compromised to inform them of
  - The nature of the breach
  - The information that may have been compromised
  - The actions that we are taking
  - How we'll keep them up to date
- Where appropriate, informing the Information Commissioner's Office (ICO) of the same.

#### Part 4: [External & Internal Parties](#)

Where appropriate, we contact all [external](#) parties and ask them if they are GDPR compliant before sharing your details. Those external parties are currently restricted to providers of Psychometric reports and profiling tools.

Internal parties - Any CCL coaching/consulting associates are required to confirm they are GDPR compliant before engagement with any CCL projects.

#### Part 6: [Changes to this policy](#)

We reserve the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any immediately affected parties will be contacted by email.

#### Part 7: [How to contact us](#)

Everyone has a right to 'be forgotten', to be able to have their information updated and to see what we hold that relates to them. Should anyone need to contact us regarding any of the above or any other matter relating to GDPR, we can be contacted on [anji@careercoachingltd.co.uk](mailto:anji@careercoachingltd.co.uk) We commit to reply promptly within one week.