

PRIVACY POLICY Sapphire Coaching & Consulting Limited

Sapphire coaching & Consulting Limited values the privacy of those who provide personal information to us. The Privacy Policy (the 'Policy') describes how and why we collect, store and use personal information and provides information about your individual rights.

This policy applies to both personal information supplied to us either by an individual or by others. We use personal information supplied to us for any of the purposes set out in this Policy, or as otherwise disclosed at the point of collection.

In this policy, we use the terms:

- Sapphire Coaching & Consulting Limited, 'we', 'us' and 'our' (and other similar terms) refer to Sapphire Coaching & Consulting Limited.
- 'Personal Information' is any information relating to an identified or identifiable natural person;
- 'Identifiable natural person' is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors; and
- 'you' and 'your (and other similar terms)' refer to our clients, individuals associated with our clients, coachees, contacts, suppliers, consultants and sub-contractors, business contacts, job applicants, staff and visitors to the Sapphire website, www.sapphirecayman.com .

Your rights in relation to Personal Information and how to exercise them

Under certain circumstances, you have the following rights:

- The right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- The right to request erasure, anonymisation or blocking of your Personal Information that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we'll let you know why; and
- Withdrawal of consent – while we do not generally process Personal Information on the basis of consent, if Personal Information is ever processed on the basis of consent an individual may withdraw this consent at any time (this may apply to processing of special categories of Personal Information including the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership).

To exercise such rights and if you have any questions about how we collect, store and use Personal Information, then please contact us using the details at the end of this Policy.

What basis do we have for processing your Personal Information?

We will only process personal information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract
- the processing is necessary in order for us to comply with our legal obligations (such as compliance with legislation);
- the processing is necessary for the pursuit of our legitimate business interests including that of the delivery of our services (for example, we have been introduced to you to potentially provide coaching services to you or your organization)

The information we collect

Depending on the circumstances, the information we may hold for you may include:

Business contacts:

Your full name

Your contact details (email, preferred contact numbers, home address)

Your company name and job title

Your area of business

Other business contact information

Clients

Your full name

Your company name and job title

Your job role and areas of responsibility

Information shared by you as part of the briefing or coaching arrangement

Coaching briefs on either the coaching to be undertaken

Details of work undertaken with Sapphire Coaching & Consulting Limited, such as session rates and timings

What we do with that information

- Contact you to discuss potential coaching and consulting opportunities
- Keeping you informed of developments at Sapphire Coaching & Consulting Limited and the services we offer that we believe may be relevant to you
- Sending requests for your thoughts on key subjects such as our blog and then sending through the collated responses
- Scheduling meetings
- Billing purposes
- To share news about any events we are organising or participating in
- Performing analytics – such as trends and coach success rates.

Our relationship with you

Sapphire Coaching & Consulting Limited sets out below how we use your data.

We are required to keep a record of the number of hours we coach. Clients' names, companies and email addresses are kept indefinitely, but this information is only ever shared with the professional coaching body, if necessary, to ensure we are maintaining professional standards.

Additionally, coaches/consultants will often keep notes of individual coaching conversations taken during and post a session. These notes may be held on paper and/or electronically. Our coaches/consultants keep your data individually – this is not shared with anyone else without your permission.

Session notes may be kept for a maximum period of four years from the completion of the coaching assignment and then archived for a maximum of six years before being destroyed. You can request a copy of your data as stipulated by the legislation.

Who else may have your information?

On occasion, in addition to the specific sharing set out above, we may need to share your Personal Information with third parties. We will only share Personal Information where we are legally permitted to do so.

Where you supply us with Personal Information as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Information in such a manner as we believe is reasonably necessary to provide our services (including as described in this Policy), or as is required under applicable law. For example, we may pass your Personal Information to third parties such as:

- professional regulatory bodies
- providers who administer psychometric tests where that is appropriate for a coaching relationship. We will provide contact details to those providers only for the purpose of initiating the service.
- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Personal Information under applicable law or regulation, including to law enforcement agencies or in connection with proposed or actual legal proceedings
- credit-checking agencies for credit control reasons
- events: we may need to pass on your Personal Information (e.g. name, company, occupation) to a third party in connection with management of an event, in which case the details will only be used by the third party for that specific purpose
- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Personal Information with our business partners (including professional advisers such as accountants or auditors), or external service providers. Our arrangements with external service providers currently cover the provision of support services including IT, events management, document production, business research, accounting, administration, bookkeeping and secretarial services.

How we hold your info: confidentiality and security

Sapphire treats the information you provide us with as confidential and does not sell any personal data to third parties and we only share personal information for legitimate business reasons.

Your information is protected through administrative measures by our staff both electronically and physically, including electronic cyber security systems such as firewalls on all our electronic equipment.

The conditions where we cannot maintain confidentiality is where we become aware of illegal activity or where the physical or mental health of the client or others is, in our judgement, is seriously at risk.

Links to other websites

The Sapphire Coaching & Consulting Limited website www.sapphirecayman.com may link to other, unaffiliated, third-party websites. Please note that Sapphire Coaching & Consulting Limited is not and cannot control or be responsible for the content or privacy and confidentiality policy of any third-party website that you may visit in order to understand how the operators of that website may collect, store and use your Personal Information.

Removing your data

You are able to be deleted from our database at any time by contacting Helen Goodier (helen.m.goodier@gmail.com) and we will ensure you are not contacted in the future unless we receive a written request from you.