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### ****GDPR-Compliant Data Protection Policy for Teen Life Coaching****

**1. Introduction** This policy outlines how I collect, use, store, and protect personal data in compliance with the General Data Protection Regulation (GDPR). As a life coach working with teens, I recognize the importance of handling personal data securely and responsibly. I am committed to protecting the privacy of all clients and ensuring their data is processed lawfully, transparently, and fairly.

**2. Purpose of the Policy** The purpose of this policy is to:

* Ensure that personal data is handled in a GDPR-compliant manner.
* Inform clients (and their parents/guardians, where applicable) about how their data is used.
* Set out the legal basis for processing personal data.
* Protect client information from unauthorized access, loss, or misuse.

**3. Legal Basis for Processing Personal Data** I process personal data based on one or more of the following legal grounds:

* **Consent:** Explicit consent will be obtained from clients (and parents/guardians where applicable) to process their personal data.
* **Contractual Obligations:** Data is processed to fulfill the contract of services between myself and the client.
* **Legal Obligations:** Certain data may be processed to comply with legal requirements (e.g., safeguarding concerns).
* **Legitimate Interests:** Data may be processed to pursue legitimate interests (e.g., keeping in contact with clients) as long as this does not override the rights of individuals.

**4. Types of Data Collected** The following personal data may be collected and processed:

* **Personal Identification Information:** Name, address, date of birth, phone number, email address.
* **Sensitive Data:** Information related to health, mental well-being, and emotional status as part of the coaching process.
* **Session Records:** Notes from coaching sessions, including progress and personal development goals.
* **Parental/Guardian Information:** Where applicable, contact details and consent forms.

**5. How Data is Collected** Data is collected through:

* Intake forms and consent forms completed by the client or their parent/guardian.
* Verbal information shared during coaching sessions.
* Email, phone, or other written communications.

**6. Use of Personal Data** I use personal data to:

* Provide personalized coaching services.
* Maintain communication with clients and, where necessary, parents/guardians.
* Monitor client progress and set coaching goals.
* Comply with safeguarding responsibilities.
* Send important updates related to the services being provided.

**7. Data Sharing** Personal data will not be shared with third parties unless:

* Explicit consent has been obtained.
* It is required by law (e.g., in safeguarding situations).
* It is necessary to prevent harm or safeguard the client’s well-being.

Where personal data is shared with third parties, I will ensure that appropriate data-sharing agreements are in place and that they comply with GDPR standards.

**8. Data Security** I implement appropriate technical and organizational measures to ensure the security of personal data. These measures include:

* **Physical Security:** Paper records (if any) are stored in a locked and secure environment.
* **Digital Security:** Electronic data is stored on password-protected devices and encrypted cloud-based systems.
* **Access Control:** Only authorized individuals (myself and, where applicable, relevant professionals in safeguarding situations) have access to personal data.
* **Data Minimization:** I only collect and retain the minimum amount of personal data necessary for the service provided.

**9. Data Retention** Personal data will be retained only for as long as necessary to fulfill the purpose for which it was collected, including:

* For the duration of the coaching relationship.
* For a limited period after the coaching relationship ends (e.g., to comply with legal obligations or for future service provision if requested). After this period, personal data will be securely deleted or anonymized.

**10. Client Rights** Under GDPR, clients (and their parents/guardians where applicable) have the following rights regarding their personal data:

* **Right to Access:** Clients can request a copy of their personal data.
* **Right to Rectification:** Clients can ask for incorrect or incomplete data to be corrected.
* **Right to Erasure ("Right to be Forgotten"):** Clients can request the deletion of their personal data when it is no longer necessary for the purposes for which it was collected.
* **Right to Restrict Processing:** Clients can request the restriction of processing under certain circumstances.
* **Right to Data Portability:** Clients can request that their personal data be transferred to another service provider.
* **Right to Object:** Clients can object to the processing of their data in certain situations (e.g., marketing).

**11. Data Breach Procedure** In the event of a data breach, I will:

* Take immediate action to contain the breach.
* Assess the severity and impact of the breach.
* Notify the Information Commissioner’s Office (ICO) within 72 hours if the breach is likely to result in a high risk to the rights and freedoms of individuals.
* Inform affected clients if necessary, providing guidance on steps they can take to protect themselves.

**12. Complaints** If clients or their parents/guardians believe their data has been handled incorrectly, they can:

* Contact me directly to resolve the issue.
* Lodge a complaint with the **Information Commissioner’s Office (ICO)** if their concerns are not addressed.

**13. Review of Policy** This policy will be reviewed annually or sooner if there are significant changes to GDPR or my data handling practices.

**Date of Policy: 12th September 2024**
**Next Review Date: 12th September 2025**

**Signed:**
**Role:** Natasha Hawkes, Life Coach