

Sarah Vigor

P E R S O N A L C O A C H

April 2025

1. Who We Are

This Privacy and Cookies Policy outlines how I, Sarah Vigor, trading as Sarah Vigor Personal Coach, collect, use, and protect your personal information. I operate as a sole trader based in the UK at:

30 Brewer Street, Lamberhurst, Kent, TN3 8DN

Email: sarah@personalcoach.com

Your privacy is important to me, and I'm committed to handling your data securely and lawfully in accordance with the UK General Data Protection Regulation (UK GDPR).

This notice applies to all clients, all third parties and suppliers with whom we have dealings in the ordinary course of our business including those individuals with whom we send marketing information.

Any reference to 'I', 'we', 'us', 'our', 'the company' shall mean our organisation.

Any reference to 'you' or 'Data Subject' shall mean any individual receiving this notice for whom I hold personal data.

2. Personal Data I Collect

In most circumstances your data will be held by me as a "Data Controller". This means that I am responsible for deciding how I hold and use personal information about you. I am required under data protection legislation to notify you about the holding of information in this privacy notice. I may update this notice at any time. Data I hold will be;

1. Used lawfully, fairly and in a transparent way, collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
2. Relevant to the purposes we have told you about and limited only to those purposes
3. Accurate and kept up to date
4. Kept only if necessary for the purposes we have told you about
5. Kept securely

I may collect and process and use the following categories of personal data:

- Full name, title, Gender, Date of Birth
- Email address
- Phone number (if provided)
- Address (if applicable)
- Payment details (processed securely via Stripe)

I may collect, store, and use the following categories of personal information about clients following some coaching interventions:

- Location of employment or workplace
- Information about your health, medical conditions, or disabilities

3. I may also collect, store and use the following “special categories” of more sensitive personal information in respect of client information arising from some coaching interventions:

- Business address and company registration number(s)
- A management contact for the business I am engaged with

3. How I Collect Your Data

Data is collected when you:

- Complete a contact or enquiry form via my website or social media accounts or via phone or email
- Book a session via my calendar (FEA Create platform)
- Sign up for newsletters or lead magnets

- Make a payment for services or products
- Interact with the website or emails (via cookies or analytics)

Data on current clients that I am actively working with is also stored in my mobile phone that is password and biologically encrypted.

Data may be stored through platforms such as zoom and will then be subject to that application's own policies.

I reserve the right to change the systems in which data is stored without notification to another equivalent system but at all times I will ensure the appropriate security of your data and GDPR compliance.

4. Why I Collect Your Data

Your data is used for:

Responding to enquiries; to fulfill contractual obligations; for legitimate business needs

Providing coaching services and products

Processing bookings and payments

Sending newsletters and marketing (only if you've opted in)

Maintaining client records

Improving my website and services through analytics

Only data that is required will be stored and for a period of time that is reasonably necessary. I will not disclose your data to third parties unless you have consented for me to do so or I am otherwise required to do either contractually or under another law or enactment.

I may also use your personal information in the following situations, which are likely to be rare:

Where I need to protect your interests (or someone else's interests)

Where it is needed in the public interest (or for official purposes)

I need all the categories of information above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, I may use your personal information to pursue legitimate interests of our own or those

of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which I will process your personal information are listed below:

- Administering the contract I have entered into with you
- Dealing with legal disputes involving you
- To prevent fraud
- To administer my business which may include disclosure of client data to my accountant

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In certain circumstances listed above, I hold your data to market other services to you, send you inspirational blogs, or send you information that I think may interest you. I have a legitimate business interest in retaining your data for this purpose, but you may 'opt out' of receiving these types of communication from me.

If you fail to provide certain information when requested, I may not be able to perform the contract I have entered with you, or I may be prevented from complying with our legal obligations.

The kind of information I hold about individuals other than clients and how this data is used

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

During my day-to-day business, I acquire information regarding individuals other than our clients and I will retain this data where I have a legitimate business reason to do so.

Typically, I acquire personal data on individuals, third parties and suppliers other than my clients in the following circumstances:

1. Where I have met individuals, third parties and suppliers at networking or other marketing events
2. Where individuals, third parties or suppliers have made enquiries with me regarding possible services but have not subsequently become clients of my business
3. Where I have dealt with individuals, third parties or suppliers in the capacity as suppliers of goods or services to me
4. Where I have regular business-related dealings with you

I have a legitimate business interest in retaining this data to send informative blogs, event details or other updates relating to my services or something that I believe relates to your interests.

You have the right to ask me to erase or rectify your data and you have the right to opt out of receiving marketing, networking information or information I think might be of interest to you.

5. Lawful Basis for Processing

I process your personal data under the following lawful bases:

- Consent – for sending marketing emails and cookies
- Contract – to deliver coaching services or products you've requested
- Legitimate interests – to maintain client relationships and grow my business (in a way that does not override your rights)

6. Third-Party Processors

To operate my services, I use trusted third-party platforms that may process your data:

- FEA Create – for calendar bookings, email communications, and managing subscriber lists
- Stripe – for secure payment processing

These platforms are compliant with UK data protection laws and act as data processors on my behalf.

I will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where I have another legitimate interest in doing so.

DATA SECURITY

I have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

I have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where I am legally required to do so.

The transmission of information via the internet is not completely secure. I cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with me by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

7. Data Retention

I retain personal data for as long as necessary to fulfil the purposes outlined above, or as long as necessary to fulfil the purposes I collected it for, including the purposes of satisfying any legal, accounting or reporting requirements; or until you:

- Unsubscribe from communications
- Request deletion of your information

To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances I may anonymise your personal information so that it can no longer be associated with you, in which case I may use such information without further notice to you.

In respect of client data, you can expect me to hold data relating to your instructions for a period of seven years after completion of the last coaching interaction. The reason for this is that the Limitation Act 1980 typically provides that legal proceedings for breach of contract or negligence can be brought up to six years after the events. I therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings ensue.

Given the nature of my services clients often return to me with repeat instructions within weeks, months or years of contacting me in the first instance. The seven-year period referred to above will start from the last contact I had with the client, third party or supplier, to ensure I am able to assist as and when I need to. Should you not contact me for seven years, I will confidentially destroy all data held for you.

Your duty to inform me of changes

It is important that the personal information I hold about you is accurate and current. Please keep me informed if your personal information changes during your working relationship with me.

8. Your Rights Under UK GDPR

You have the right to:

- Access the personal data I hold about you
- Request correction of inaccurate data
- Request deletion of your data
- Withdraw your consent (where consent is the basis for processing)
- Object to processing based on legitimate interests
- Lodge a complaint with a supervisory authority

To exercise any of these rights, please email sarah@personalcoach.com.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that I transfer a copy of your personal information to another party, please contact me directly.

Please note that where you ask me to erase, correct, object to process or seek to restrict my processing of data I may refuse your request where I have a legal obligation, contractual or other legitimate business interest to refuse your request. If I refuse your request, then I will notify you of this refusal and you will have the right to appeal.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, I may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, I may refuse to comply with the request in such circumstances.

I may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact me directly. Once I have received notification that you have withdrawn your consent, I will no longer process your information for the purpose or purposes you originally agreed to, unless I have another legitimate basis for doing so in law.

9. Cookies

My website uses functional and analytics cookies to enhance your experience and understand website traffic. These may include cookies from:

- My website builder (FEA Create)
- Analytics platforms (e.g., Google Analytics, if added in the future)

When the website launches, a cookie banner will be in place to obtain your consent where necessary.

10. Links to Other Websites and social media

My website may contain links to third-party websites. Once you leave my site, I have no control over the privacy practices of those external sites. Please refer to their privacy policies directly. The owner of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. You should therefore click on external links at your own risk and this website and owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Any engagement or action taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies help by those social media platforms. Users are advised to use caution in regard to their own privacy and personal details when using social media. This website nor its owners will ask for personal or sensitive information through social media platforms and suggest any need to discuss sensitive information is done so directly through direct communication channels such as phone or email. This website may have links to social media platforms. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

11. How to Contact Me

If you have questions about this policy or your data, please contact:

Sarah Vigor

Email: sarah@personalcoach.com

12. Your Right to Lodge a Complaint

If you are concerned about how your data has been handled, please contact me as data privacy manager. You can contact the Information Commissioner's Office (ICO) regarding complaints:

- Helpline: 0303 123 1113

- Website: <https://ico.org.uk/>

[Privacy and Cookies Policy](#)

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www.PersonalCoach.com