

# PRIVACY POLICY



To comply with legislation on privacy in force from 25 May 2018, (General Data Protection Regulation), it is my duty to inform people of how I use and store their information.

## WHO I AM

I am Deborah Henry-Pollard, a self employed freelancer running a coaching business called Catching Fireworks. Catching Fireworks is registered with the Information Commissioner's Office (ICO), Ref: Z3585624.

## THE INFORMATION HELD

The data held is business information from clients and contacts met either in person or online and given with their consent. The basic information is name, address, other contact details and details of meetings/communications.

I hold client notes on coaching sessions held, as part of my professional practice and for my insurance conditions. Client information is held for at least 6 years, to comply with tax and insurance requirements.

No financial information is held by Catching Fireworks; payments are made by bank transfer, cash or Paypal, so any financial information is held by the Halifax and Paypal, who are bound by Data Protection covenants and must process the personal information in accordance with this privacy policy.

### Mailing List:

When you sign up to my mailing list, via Mailchimp, the data is used for monthly newsletters plus a Christmas message and very occasional additional mailings. It is not downloaded or processed for any other reasons, or shared or sold to a third party. You can unsubscribe immediately at any point through links within the newsletter, or by [emailing me](#) to ask to be removed. (Please note that if you contact me through my general website contact form or appointments software, you are NOT added to my mailing list.)

You have a right to access your information and to complain about how it is being held. Please see the [ICO website](#) for full details.

### Catching Fireworks®

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[www.catchingfireworks.co.uk](http://www.catchingfireworks.co.uk)

## LAWFUL BASIS FOR HOLDING DATA

The lawful basis for Catching Fireworks' processing personal data are:

**(a) Consent:** the individual has given clear consent for me to process their personal data for a specific purpose: *namely for my newsletter mailing list, or through giving me their business cards for future potential collaborations*

**(b) Contract:** the processing is necessary for a contract I have with the individual, or because they have asked me to take specific steps before entering into a contract: *namely for coaching sessions and services, for producing quotes, invoices, contracts and client notes*

**(c) Legal obligation:** the processing is necessary for me to comply with the law (not including contractual obligations): *namely to fulfil insurance and tax conditions*

## INDIVIDUALS' RIGHTS REGARDING INFORMATION HELD

You have a right to access your information and to complain about how it is being held. Please see the [ICO website](#) for full details.

Mailing List:

You can delete your subscription at any time via 'unsubscribe' buttons in the newsletters. This automatically unsubscribes you from the newsletter list. Or you can [email me](#) to ask to be removed.

### Subject access requests

You can request the information held on you. I would endeavour to acknowledge requests within 24 hours (during the working week) and send information within 5 working days maximum.

On request from non-clients:

- if requested, details will be taken off contacts database
- general contacts would not usually be added to any documents/spreadsheets. However the laptop will be searched for any other mentions of the contacts

On request from clients:

- for tax purposes, information pertaining to professional services are kept for at least 6 years after the 31 January submission deadline of the relevant tax year. After that date, records can be deleted on request.
- client records will be kept for 10 years, or 6 years if deletion requested by clients
- if requested, client details will be archived and flagged NOT TO BE CONTACTED and then deleted at the end of 6 years.

Everything relevant will be sent in pdf form, for example:

- client notes
- invoices
- contracts
- all information on contacts database

## Cookie Policy

My website uses cookies – small text files that are placed on your machine to help the site provide a better user experience. In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the [About Cookies](#) website which offers guidance for all modern browsers. Catching Fireworks does not use or retain any information collected by cookies.

**Deborah Henry-Pollard**

14 March 2018