

GDPR and Stephen Long Coaching Policy

This policy will be updated as new information is available or corrections need to be made.

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GDPR

The GDPR legislation is a daunting document with 99 Articles and 173 Recitals that outline the new, comprehensive standards. This regulation can be summarised into seven equally-weighted principles:

- 1. Lawful, fair, and transparent processing:** Explicit consent by the consumer is critical before any personal data can be captured, processed, or stored. Also allows for the ‘right to be forgotten,’ where a consumer can request their personal data be deleted. Individuals also have the right to access all their personal data a company may hold.
- 2. Purpose limitation:** Organisations must have a legitimate and lawful purpose for processing personal data.
- 3. Data minimisation:** Organisations should capture the minimum amount of data needed for the specified purpose.
- 4. Accurate and up-to-date processing:** Organisations must employ data controllers to ensure information remains valid, accurate, and t for the specified purpose.
- 5. Limitation of storage in the form that permits identification:** Discourages organisations from keeping personal data for longer than is necessary.
- 6. Confidential and secure:** Organisations must protect the privacy and integrity of the data by ensuring its security.
- 7. Accountability and liability:** Organisations must demonstrate compliance to the regulation.

G Suite and Google Drive

To comply with the new regulations that come into effect on 25th May, 2018, Stephen Long Coaching uses G Suite to for email and Chat and also G Suite’s Drive to store resources created and downloaded and, if needed, send those documents to clients.

For a detailed explanation of how G Suite complies with GDPR please visit or click the following link:

<https://www.google.com/cloud/security/gdpr/>

Specifically:

Quoting from: https://gsuite.google.co.uk/intl/en_uk/faq/security/

“My organisation is subject to EU data protection requirements. Can I use G Suite?

Yes. Google has a broad customer base in Europe. Google provides capabilities and contractual commitments for our customers designed specifically to help address EU data protection requirements and the guidance provided by the Article 29 Working Party. G Suite offers EU [Model Contract Clauses](#) and a [Data Processing Amendment](#). Additionally, G Suite

has been assessed as appropriate for use with the [UK government's Cloud Security Principles "OFFICIAL \(including OFFICIAL- SENSITIVE\)"](#).”

Email

The following footer is added to all, outbound messages.

Any email or chat held by Stephen Long Coaching is automatically, permanently deleted after 30 days unless it has a label or labels assigned. Any email labelled *Awaiting Response* or *Follow up* will be actioned within 14 days or have its label or labels removed.

There is a limit to the number of characters that can be used in the footer and so the following is further explanation.

Stephen Long Coaching uses the mail client G Suite. G Suite provides a Google Admin where settings can be automatically applied to email and Chats. The minimum time frame for automatic deletion of email is 30 days. G Suite allows the addition of labels to email and Chats. One label that may be used for client or payment correspondence is *Invoices*. The two other labels that may be used for client or relevant action is *Awaiting response* or *Follow up*. No other labels other than *Invoices*, *Awaiting response* or *Follow up* will be used with email correspondence with potential or current clients. Any email or Chat labelled *Awaiting response* or *Follow up* will be actioned within 14 days or the label or labels will be removed. The email or Chat will then be automatically, permanently deleted after 30 days.

Group Emails

In the event that multiple clients or attendees need to be contacted by email Bcc: functionality will always be used for correspondence.

Access to Email or Google Drive

Stephen Long is a sole trader. There are no other employees and so access to email, any personal information and Google Drive is solely by Stephen Long.

Agreement

Clients sign the Client Coaching Agreement and Consent Form (please see the Stephen Long Coaching website footer: www.stephenlongcoaching.co.uk).

Client Coaching Agreement and Consent Form

Stephen Long Coaching encourages all clients to complete the [Google Forms Client Coaching Agreement and Consent form](#). The form details the two legal bases that are used to process the client's data.

Notes taken in Sessions

Minimal notes are taken in the session and they are securely shredded as soon as possible after the session once the securely stored electronic notes are sent.

Security of Computers

All computers have complex, diceware passwords at the login stage known only to Stephen Long.

Security of Files

Notes in the form of an email are sent to the client as soon as possible after the session. They are sent using GSuite's Confidential Mode. This means that the emails can a) only be opened by the person that the notes were sent to, and b) they can't be forwarded, copied or printed.

All emails are kept in accordance with the email retention policy.

Files that are shared for information purposes will be sent in Read mode only with a maximum expiry date of 30 days from when the link is sent. Invariably, the client will not be able to print or download the files unless it is clearly in the interest of the client to have downloadable access. This will be agreed in the session.

All files remain the ownership of Stephen Long Coaching. However, specific licensing such as in regard to the professional photography images used in the documents means that Stephen Long Coaching does not have rights to sell the images or sell any products with the images printed on them.

Password Security Breach

Both the client and Stephen Long Coaching has the password and, in the event of disclosure to a third party, the password will be immediately changed by Stephen Long Coaching and a new, unique password generated will be sent to the client.

Computer and Laptop Breach

It is extremely improbable that a computer breach will occur. However, were it to do so all personal information on current clients are password-protected with unique, strong passwords in addition to the complex, diceware password at logon. Thus, access to personal information is virtually impossible. Never the less, all current clients will be informed within 72 hours of a computer breach and their files will be deleted.

iPhone and iPad Breach

Stephen Long Coaching also uses iPhone and iPad to hold names, email addresses and conversations on current clients. Both devices, in the event of their theft or loss, will be remotely wiped and all current clients will be informed of the breach within 72 hours.

Website

The Stephen Long Coaching website: <https://www.stephenlongcoaching.co.uk> uses [SSL security](#). This means that contact forms completed on the website are submitted via HTTPS.

Contacting Stephen Long Coaching

Stephen Long Coaching can be contacted directly through the website: <https://www.stephenlongcoaching.co.uk/home>. Any information entered is automatically saved in the 'inbox' on the website and the contact details are added to the contacts' section on the website. Both means of storage will be permanently deleted if an enquirer chooses not to become a client (within 24 hours) and within 24 hours when the client ceases to be a client.

Stephen Long Coaching can be contacted via the business Facebook page Book Now button: www.facebook.com/stephenlongcoaching. The enquirer is redirected to the website and provided with the opportunity to book using the 10to8 booking system explained below or to send an email and make a booking. In terms of email or message correspondence, it is treated in accordance with the legitimate interests previously identified.

If Stephen Long Coaching is directly contacted by text/message, phone call, email or FaceTime/Skype it will be treated in accordance with the legal basis identified in this Privacy Notice and will be permanently deleted if an enquirer chooses not to become a client (within 24 hours) and within 24 hours when the client ceases to be a client.

Consent

Your privacy is important and Stephen Long Coaching also wants to communicate with you in a way that has your consent, and which is in line with UK law on data protection.

Communication may be in two ways:

- Firstly, Stephen Long Coaching uses 10to8, which is an online booking, confirmation and reminder service. [All data is stored on Amazon servers in Ireland](#) and so is subject to GDPR-compliance. [You may read 10to8's Privacy Policy](#). To receive an automated email and/or text confirmation as well as an automated reminder of the agreed date and time of your coaching session you grant your consent. Consent is an opt-in decision. It is entirely your choice and you may provide or withdraw your consent at any time by contacting Stephen Long Coaching.
- Secondly, the Client Coaching Agreement and Consent Form indicates that coaching offers, or promotional material, may be offered. You can consent or choose not to consent. Once again consent is an opt-in decision.
- Thirdly, Stephen Long Coaching manages a blogsite, as part of the www.stephenlongcoaching.co.uk website. Visitors have the opt-in option of subscribing to the blog and receiving an email whenever a new blogpost is published. (The blog site has its own option to unsubscribe and subscribers can unsubscribe at any time by submitting the request via the blogsite form. Their details will then be permanently deleted within 24 hours by Stephen Long Coaching.)

With regards to consent, you may provide or withdraw your consent at any time by contacting Stephen Long Coaching.

In terms of consent your details will never be passed on to any 3rd party without your prior consent.