

GENERAL DATA PROTECTION REGULATION (GDPR)



PRIVACY INFORMATION

To comply with legislation on privacy in force from 25 May 2018, 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. The basic information is name, address, other contact details and details of meetings/communications.

I also hold client notes on coaching sessions held, as part of my professional practice and also for my insurance conditions. Client information is held for 7 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.

Mailing List:

When you sign up to my mailing list, this is done 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 any third party. You can unsubscribe immediately at any point through links within the newsletter, or by [emailing me](#) to ask to be removed. I remove anyone who hasn't opened a newsletter for 12 months.

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.

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*

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

(c) Legal obligation: the processing is necessary for you 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

Deborah Henry-Pollard

12 March 2018