

Privacy Policy

Business Name: ruthakinwalecoach

Data Controller: Ruth Akinwale

Contact Email: ruthakinwalecoach@gmail.com

Welcome to ruthakinwalecoach.com. We provide coaching and trauma-informed coaching support. We are committed to protecting the privacy of all our clients, with a special emphasis on safeguarding children and young people.

This policy explains how we collect, use, and protect your personal data in accordance with applicable UK data protection law, including the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025 where relevant.

1. Important Note for Children and Parents

Children and young people have rights over their personal data. Where a child or young person uses our services, we consider their age, maturity, understanding, and best interests when deciding how to explain privacy information and obtain any required consent. For children under 13, a parent or legal guardian must provide consent for online service use where consent is the lawful basis. For young people aged 13 to 17, we may accept their own consent where they have sufficient understanding, but we may involve a parent or guardian where this is appropriate, lawful, and in the young person's best interests.

- **Under 13s:** If you are under the age of 13, your parent or legal guardian must provide consent where consent is required for us to provide online services to you. We may also need parent or guardian involvement before sessions can take place, depending on your circumstances and safeguarding needs.
 - **Ages 13 to 17:** Young people in this age bracket can often provide their own consent if they fully understand the process, but we encourage involving a parent or guardian where appropriate.
 - **Best Interests:** In line with the Information Commissioner's Office (ICO) guidelines, the best interests of the child are our primary consideration in how we handle information.
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If our website or online services are likely to be accessed by children in the UK, we take account of the ICO Children's Code and the higher protection expected for children's information, including age-appropriate privacy information, data minimisation, and the best interests of the child.

2. Information We Collect

We only collect information that is absolutely necessary to provide safe and effective coaching and trauma-informed coaching therapy.

- **Initial Intake Data:** Name, age/date of birth (to verify safeguarding requirements), and contact details. This is collected securely via **Google Forms** when we first meet.

- **Special Category (Health/Trauma) Data:** Due to the nature of trauma-informed coaching therapy, you or your child may share sensitive data regarding emotional well-being, mental health, or personal history.
 - **Session Data:** Visual and audio data processed during live online sessions via **Zoom**. (*Note: We do not record Zoom sessions without explicit consent*).
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3. Lawful Basis for Processing (Data Protection Act 2018)

Under UK data protection law, we must identify a lawful basis before using personal data. Depending on the purpose, we may rely on contract where processing is necessary to provide requested coaching services, consent where we ask for clear permission for a specific use, legal obligation where the law requires us to keep or share information, vital interests where processing is necessary to protect someone's life, and legitimate interests where we have a fair and balanced reason to use personal data in running and protecting our service.

1. **Contract:** To provide the coaching and therapy services you request.
 2. **Consent:** When you or your guardian fill out our initial Google Form.
 3. **Special Category Data:** Where you share information about health, emotional wellbeing, trauma, or other sensitive matters, we treat this as special category data where UK data protection law applies. We process it only where we have a lawful basis under Article 6 UK GDPR and a special category condition under Article 9 UK GDPR, such as explicit consent or another applicable condition required for safeguarding, care, or legal obligations.
 4. **Safeguarding & Vital Interests:** We may process or share data without consent if it is necessary to protect a child or vulnerable individual from harm.
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We use personal data to respond to enquiries, assess whether our services are suitable, provide coaching support, manage bookings and communications, keep safeguarding and professional records, meet legal and insurance obligations, maintain service security, and handle data protection requests or complaints.

4. How We Use and Share Your Data

We treat your data with the highest level of professional confidentiality. We never sell or rent your information.

Your data is only shared with the following essential processors to run our service:

- **Google Workspace:** To securely collect and hold your initial intake details via Google Forms and related Google services used to administer the service.
- **Zoom Video Communications:** To securely host our online coaching and therapy sessions.

Safeguarding Exception: If Ruth Akinwale reasonably believes that a child or young person is at immediate risk of serious harm, confidentiality may be broken to contact emergency services, GPs, or local child safeguarding authorities.

5. International Data Transfers

Google and Zoom may process personal data outside the UK. Where personal data is transferred internationally, we take steps designed to ensure that the transfer is protected in accordance with UK data protection law, which may include an adequacy decision, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or other appropriate safeguards.

Cookies and similar technologies: If our website uses cookies, analytics tools, embedded content, contact forms, or similar technologies, we will provide clear information about what is used, why it is used, and how you can manage your choices. Non-essential cookies will only be used where the required consent has been obtained.

6. Data Retention

We keep client records only as long as necessary:

- **Adult records:** We generally retain adult client records for 7 years after the end of our coaching relationship, unless a longer or shorter period is required or justified by legal, safeguarding, insurance, complaint-handling, or professional obligations.
 - **Children and youth records:** We generally retain records relating to children and young people until the client reaches age 25, or for 7 years after the end of services if the client was 18 or older when services ended, unless a different period is required or justified by safeguarding, legal, insurance, complaint-handling, or professional obligations.
 - **Unused Enquiries:** If an initial Google Form is submitted but you do not proceed with our services, the data is deleted within 6 months.
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Security: We use appropriate technical and organisational measures to protect personal data, including limiting access to client information, using secure account settings where available, keeping records only for as long as needed, and reviewing how personal data is stored and shared. No online service can be guaranteed to be completely secure, but we take reasonable steps to protect the information entrusted to us.

7. Your UK GDPR Rights

You may have the right to access the personal data we hold about you, ask us to correct inaccurate data, ask us to erase data in certain circumstances, restrict or object to processing, request data portability where applicable, withdraw consent where we rely on consent, and challenge certain automated decisions where applicable. Some rights may be limited where we need to retain records for legal, safeguarding, insurance, or professional reasons.

- **Access** the information we hold about you.
- **Correct** any mistakes in your data.
- **Erase** your data (the "right to be forgotten"), subject to our legal and insurance requirements to keep clinical records.

- **Restrict** or object to how we use your data.

To exercise these rights, please email Ruth Akinwale at ruthakinwalecoach@gmail.com

8. User Accuracy & Limitation of Liability

- **Accuracy of Client Data:** It is the user's responsibility to ensure that all information submitted via Google Forms is accurate, complete, and up to date. Ruth Akinwale and ruthakinwalecoach accept no liability for administrative errors, delivery failures, or service disruptions caused by incorrect, incomplete, or outdated information provided by the client or guardian.
 - **Disclaimer:** This website privacy policy serves as an informational document regarding data handling practices. While every effort is made to maintain complete legal compliance, it does not constitute binding legal counsel.
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This privacy policy explains our approach to personal data. It does not limit any rights you have under UK data protection law and does not exclude or restrict any liability that cannot lawfully be excluded.

9. Complaints Procedure

In line with the Data (Use and Access) Act 2025, we maintain a process for handling data protection complaints. If you have a concern about how your personal data is handled, you can contact us using the details in this policy.

1. Email your concern to ruthakinwalecoach@gmail.com
2. We will acknowledge your complaint within 30 days of receiving it, take appropriate steps to investigate and respond without undue delay, keep you informed where appropriate, and tell you the outcome of your complaint.
3. If you remain unsatisfied, you have the right to lodge a complaint with the UK regulator, the Information Commissioner's Office (ICO).