



Privacy Policy

I am committed to protecting your privacy and ensuring the confidentiality of your personal information. I follow the terms of the UK General Data Protection Regulation 2018 (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 (DUAA), to ensure responsible and secure use of your data. As such, I am registered with the Information Commissioner's Office (ICO), reference ZC216936, and comply with their requirements.

The UK GDPR refers to 'data controllers' and 'data processors.' For the purposes of my business (Emma Frampton Limited) I hold the roles of data controller and of data processor. I may also use third party intermediaries as data processors – including (but not limited to): my webhost and email providers; my webform providers; my phone company; my electronic file storage, my business bank and accounting software. I have a legitimate interest in processing personal data to provide coaching, therapy (counselling or ecotherapy) or nature connection services.

The purpose of this statement is to let you know what personal information is collected and held, why it is collected, use of third parties, how long it is stored and your rights over your personal data.

1. Information I Collect

The UK GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. I have explained these below:

If you fill in a form on my website: information may be processed and held by intermediary services (e.g., Google) as well as being sent to my own business email accounts. This is consistent with the Lawful Basis of 'Legitimate Interest' in that a third party using a webform to contact me, knows that that information will be transmitted and stored electronically and expects that I will respond to, or otherwise action, their communication.

If you are currently accessing my services or if you are in contact with me to consider coaching, therapy or nature connection: I will process your personal data where it is necessary for the performance of our contract.

UK GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information.' The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case coaching, therapy or nature connection

services) and necessary for a contract with a health professional (in this case, a contract between me and you).

If you have had coaching, therapy or nature connection with me and it has now ended: I will use legitimate interest as my lawful basis for holding and using your personal information.

2. My Use of This Information

Your information is used solely for the purpose of providing effective coaching, therapy or nature connection services.

Initial contact: When you enquire about services, I ask for contact details and relevant personal information from you that are needed to answer your enquiries, to keep you informed and to conduct a risk assessment, where relevant, such as:

- Personal details: Name, contact information, date of birth and other relevant details such as third-party contacts in case of emergency
- Health information: Medical history, mental health concerns, treatment plans

Alternatively, your GP or other health professional may send me your details when making a referral for therapy.

While you are accessing services: Your data will be used only to provide you with my services and to give you information relating to my services, such as:

- Scheduling and managing appointments
- Delivering coaching and/or therapeutic support
- Communicating with you about your care
- Processing payments
- Meeting legal and regulatory obligations, such as record keeping

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to conduct specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted. These suppliers include (but are not limited to):

- Zoom and Google Meet for setting up online sessions
- Starling bank and HMRC process payments and log regulatory information in relation to receipt of payments and tax returns
- Microsoft Office 365, Google, WhatsApp and Apple for: email correspondence and scheduling appointments, records of your personal details to help the coaching, counselling, ecotherapy or nature connection services run smoothly, written notes of each session.

After coaching, therapy or nature connection services have ended: Once coaching, therapy or nature connection services have ended your records are kept for 7 years from the end of our

contact with each other and are then securely destroyed. For security reasons I do not retain WhatsApp or text messages for more than 1 year at the latest since the last message after coaching, therapy or nature connection services have ended. If you want me to delete your information sooner than this, please tell me via email.

3. Security

I will take all reasonable precautions to prevent the loss, misuse, or alteration of information you give me.

Communications in connection with this service may be sent by email. For ease of use and compatibility, communications will not be sent in an encrypted form unless you require it and give me permission to communicate with you in that way. Email, unless encrypted, is not a fully secure means of communication. Whilst I endeavour to keep our systems and communications protected against viruses and other harmful effects, I cannot bear responsibility for all communications being virus-free.

4. Confidentiality and Disclosure

All information shared during sessions is kept strictly confidential. I will not disclose your information without your consent, except:

- If required by law (e.g., safeguarding concerns)
- If there is a risk of harm to yourself or others
- To comply with professional or ethical obligations

5. Data Storage and Security

I store your data securely using encrypted systems and password-protected files, or in the case of paper notes in a locked cupboard. Access is restricted to authorised personnel only. I retain your records for the duration required by law or professional guidelines, after which they are securely destroyed.

6. Your Rights over Your Personal Data

Under UK data protection law, you have a number of rights in relation to the personal data I hold about you. These include the right to:

- Access the personal data I hold about you (a Subject Access Request)
- Correct or update inaccurate information
- Request deletion of your data (subject to legal or professional retention obligations)
- Object to or restrict how I process your data

To exercise any of these rights, please contact me at contact@emma-frampton.co.uk

6a. Data Protection Complaints Process

If you have a concern about how I handled your personal data, you have the right to raise a complaint directly with me before escalating to the ICO. I am legally required to have a process in place for handling such complaints.

To raise a data protection complaint:

Email me at: contact@emma-frampton.co.uk with the subject line 'Data Protection Complaint'

Once I have your complaint, I will:

- Acknowledge it within 30 days of receipt
- Investigate the concern without undue delay, keeping you informed of progress
- Provide you with the outcome of my investigation without undue delay

Complaints can be submitted by email only. If a complaint is submitted on behalf of someone else, I may need to verify that the person is authorised to act on their behalf.

If you remain unhappy after I have responded, or if I have not responded within a reasonable time, you may escalate your complaint directly to the ICO:

Information Commissioner's Office

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

Helpline: 0303 123 1113

7. Third-Party Services

I do not share your data with third parties for marketing purposes. If I use third-party platforms (e.g., for video sessions or payment processing), I endeavour to ensure they comply with relevant data protection laws.

8. Therapeutic Will

Your name and contact details will be shared with my Therapeutic Executor. This is so that should I die unexpectedly while you are still accessing my services (coaching, therapy or nature connection) with me, you will be contacted and offered alternative support.

9. Changes to This Policy

I may update this Privacy Policy from time to time to reflect changes in law or my practice. Any changes will be posted on my website and communicated to you as appropriate. This policy was last updated in June 2026 to incorporate requirements under the Data (Use and Access) Act 2025.

10. Contact

If you have any questions or concerns about this Privacy Policy or your data, please contact:

Emma Frampton Limited

- Email: contact@emma-frampton.co.uk
- Phone: 07345 207558

Please note: Informed Consent

When you read through your Agreement and my Privacy Policy, please ask me anything you are not sure about. By signing the Agreement, it confirms that you agree to the terms as well as to the terms of this Privacy Policy statement, giving informed consent.

Disclaimer

This document outlines what I have done to ensure the confidentiality of your data and personal information, according to legal requirements. However, it is important to be aware that I do not have control over external software, apps or service providers, including those that you use. As such, it is important that you are happy with the services you use at your end. In addition, there are sometimes rare and unforeseen data breaches over which I have no control, such as hacking incidents.