Privacy Policy

The purpose of this document is to explain our policy regarding your personal data and how we use it.

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1. About The Big Blue Box Ltd

The Big Blue Box Ltd provides coaching and mentoring, peer advisory group, and counselling services to individuals.

We trade as The Big Blue Box Ltd for coaching, mentoring and peer advisory group services. We typically provide these services through your employer's organisation, or directly to you privately.

We trade as Untangle Your Life for counselling services, where we usually work directly with you as someone seeking counselling support. You may also be introduced to us through a third-party referral, for example by a doctor, clinician or charity.

2. Our Data Controller – Identity and Contact Details

For the purposes of compliance with Data Protection regulations, The Big Blue Box Ltd is a data controller. You can contact us at:

Contact details:

Data Controller:	The Big Blue Box Ltd
Email:	bigblueboxinfo@thebigbluebox.co.uk
Telephone: voice /fax:	+ 44 (0)1932 843933.
Please write to us at:	The Big Blue Box Ltd 1 The Laurels Weybridge Surrey KT13 9LF
This policy is on our website at:	The Big Blue Box Privacy Policy
Further copies of this policy are available on request.	

If you would like to discuss our progress against this policy and its objectives, complain, or request that we change or delete any data we might hold about you, please contact us using any of the media above.

3. On what basis we collect personal data

a) Consent

For all our coaching and counselling clients, we collect and process personal data on the basis of Consent. You decide what you share with us in our conversations with you. Your consent will be requested in our first meeting with you.

We also ask for your consent before adding you to any marketing emails we send to more than one person.

b) Legitimate Interest

For our marketing and operational activity, we initially process personal data on the basis of Legitimate Interest. Working in a sensible, business-to-business approach, we contact appropriate professional individuals within an organisational context, who may have a legitimate interest in our services. Such personal data is business contact information, usually published by the person or their organisation, or obtained from business contact research services.

c) Contract

There are moments, particularly in the early stages of our engagement, when we have been asked to do something by you but before we have obtained your consent to process your personal data, such as providing you with information about our coaching or counselling, perhaps as part of our contract with an organisation (an employer or doctor). We will then seek your consent to process your data as part of our agreement to work with you.

4. The purpose for processing personal data

We have several reasons for processing personal data:

a) Coaching and Counselling

The Big Blue Box Ltd provides coaching and counselling services to individuals.

Coaching and counselling services are provided in the form of a confidential conversation between a counsellor or coach, and you, the individual counselling client or coachee.

It is the nature of this work that these conversations can explore some very sensitive and confidential subjects. The effectiveness of our support can be directly related to the extent to which you share this information with us.

We maintain records of your coaching and counselling conversations, and the contact and background details that you have shared with us to help us to provide these services.

b) Marketing

The marketing of our coaching service uses personal data to contact appropriate professionals within organisations who may be seeking to engage with a provider of coaching. Our marketing uses data to define, connect with and manage a relationship with current, prospective, and historical coaching clients, and sponsors of coaching projects.

The marketing of our counselling service also uses personal data to enable us to establish and maintain contact with those who procure counselling for themselves or others.

c) Our Operations

We process personal data to manage our day-to-day business operations. We process personal data when managing and working with our suppliers and stakeholders, when processing information within our marketing, accounting and finance system, and when managing our IT and telecommunications systems.

5. How we collect personal data

We collect personal data and information through several methods.

Third parties may provide us with access to some personal data, which may be anonymised, during the early stages of setting up and introducing prospective coaching and counselling clients, such as an employer's representatives (e.g. HR teams) or a doctor. It would be expected that prior permission would have been given by the data owner (our prospective coaching or counselling client) for such information to be shared with us.

We collect most of the personal data and information we process during our coaching and counselling conversations with the client. This data would usually include a self-completed client profile form and our handwritten notes made at the time of the conversation.

We collect personal data and information from documents and correspondence shared with us by our clients.

We also collect personal data and information from open, public sources such as LinkedIn, publications, companies' websites, other sources of organisational information, and business contact research services.

6. What personal information we hold

Prior to our engagement with you, we may have been given some anonymised background information about you to assist us in our engagement decision. This may have been shared with us by a 'project sponsor' within a corporate HR dept or by a referring agency acting on your behalf, such as a doctor's practice.

In our first conversation with you, we will gather essential contact information together with other background information that you choose to share with us, such as family background, career history, and your reasons for engaging with our services, etc.

We will explore some of the events, issues, behaviours and further similar information that have brought you to engage with us. We will make notes of the coaching and counselling conversations.

As part of our evaluation process, we ask our clients to report back to us on their experience and their outcomes, which may include completing a feedback or evaluation form.

If you are a prospective client or a professional contact, we hold your name, role, organisation, work contact details, LinkedIn profile, and a record of our contact with you.

7. Use of children's personal information

We do not knowingly collect or store any personal information about children under the age of 16.

8. What we use the data for

We use personal data to enable us to deliver our services. For example, we use notes from our conversations with a client to help us deliver our service.

We use the personal data to improve our skills. As part of our personal and professional development, we work with professional supervisors who oversee our practice and provide guidance and support to us as practitioners. We share elements of our client interactions and experiences with our supervisors. These conversations are also confidential and anonymised, protecting the client data and identity.

We use personal data to assist us in the marketing and management of our business, and the provision and improvement of our services.

We also use data to enable us to study and share information about the nature of coaching and counselling. For example, we periodically compile case studies to share with potential clients, practitioners, and others. We fully depersonalise and disguise these case studies to protect identity and respect confidentiality.

9. How data is processed

The data we use exists primarily in electronic form, in computer-based records within standard software products running on our hardware or in a cloud- or internet-based solution. We use data on mobile phones, tablet computers, and desktop PCs, and link it to on-site and cloud-based 'backups'. We also have some client data in paper files, kept in lockable

filing drawers. Some of these are scanned and saved digitally. We continue to rely on long-term, professional offsite IT support to provide up-to-date, effective data security, technical infrastructure maintenance, and advice.

Some of our systems, such as our customer relationship software, are hosted by reputable providers that may store data outside the UK, under safeguards required by UK data protection law.

10. How long we keep personal data

The coaching or counselling relationships we have with our clients may be short-term, lasting just a few sessions; they can be continuous; or they may stop and restart later. To enable us to offer ongoing support, we may retain personal data indefinitely.

For prospective clients and professional contacts we have not worked with, we review our records regularly and stop marketing to those who have not engaged with us.

11. How we share data

Your data and the notes we retain are confidential; we do not share your data with anyone or any other organisation, except under certain circumstances. Those circumstances could include disruption to our business continuity, or reporting significant risks, such as safety and health risks, to responsible parties (for example, a doctor, clinician or company officer).

In these circumstances, we will discuss our responsibilities with you.

We do not sell your data.

12. How we give information about our privacy procedures

Potential sponsors for coaching or counselling engagements and projects are made aware of our Privacy Policy and other policies during negotiations, contracting and during ongoing engagements as appropriate.

We share this Privacy Policy verbally with our potential coaching and counselling clients individually during their initial conversations with us.

We invite potential clients to confirm their consent to our processing of their data by signing a copy of our consent form and by offering them a copy to retain for their records.

Our policy is published on our website. Copies are available as noted above.

13. How we manage your consent

You can withdraw your consent for us to process your personal data at any time.

We publish links and contact information in our emails, in this policy and on our website to enable you to update your consent.

You can ask us to stop sending you marketing at any time, and we will. Just reply to any of our emails or contact us using the details above.

14. Your rights

The legislation includes rights to:

- Access and confirmation that data is being processed
- Rectification to ensure accuracy
- Erasure of personal data
- Restrict processing
- Data Portability
- Object to data processing

Please see our Data Controller's contact details above to progress requests.

If you are unhappy with how we have handled your data, you can complain to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint or on 0303 123 1113.

The Big Blue Box Ltd

Privacy Policy Consent Form

1. Confidentiality and Privacy

For full details of our Privacy Policy, please visit:

The Big Blue Box Privacy Policy

2. Privacy Policy – Your Consent

The Big Blue Box Ltd provides coaching and mentoring, peer advisory group, and counselling services to individuals.

We trade as The Big Blue Box Ltd for coaching, etc., and as Untangle Your Life for counselling.

I confirm that I give my consent for The Big Blue Box Ltd to collect and process my personal data for the purposes of:

(Please tick, delete or describe as appropriate)

- ☐ Providing me with coaching, mentoring, peer advisory group, and counselling services
- ☐ Retaining a relationship with me
- ☐ Keeping me informed on topics that may be of interest to me within coaching, mentoring and counselling subjects

Other:
Please describe

Name:

Title:

Organisation:

Contact Address:

Email:

Telephone:

I am aware that I can withdraw my consent at any time.

Signature: _____ Date: .....

Please return a signed Privacy Policy Consent Form to: bigblueboxinfo@thebigbluebox.co.uk

The Big Blue Box Ltd
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