

Privacy and GDPR Policy

Lumivera Coaching & Consulting Limited

Effective date: 7 June 2026

Lumivera Coaching & Consulting Limited (“Lumivera Coaching,” “we,” or “us”) is the data controller responsible for your personal information. This policy explains how we collect, use, and protect the personal data you share with us when you use our website or services, and how we comply with the UK General Data Protection Regulation (UK GDPR). It covers both visitors to our website and clients engaging in coaching services.

1. Information we collect

1.1 Personal information. We may collect your name, email address, contact details, billing information, and other information needed to provide our services - for example, what you submit through our website contact form, when you book a session, or when you contact us directly.

1.2 Usage data. We may collect information about how you use our website, including your IP address, browser type, pages visited, and other analytics data.

1.3 Booking and messaging. When you book through Cal.com, or contact us by email, phone, or a messaging app such as WhatsApp, we receive the details and messages you provide. Please do not share sensitive personal information, including health details, through general messaging. If you would like to discuss your situation, book a discovery call, where information is handled with appropriate consent.

1.4 AI processing data. We may use artificial intelligence (AI) tools to support the creation of coaching materials, task suggestions, and content frameworks. Where AI tools are used, we process only anonymised or non-identifiable information, such as general coaching themes, goals, or topic areas. We do not provide AI systems with your name, contact details, or other directly identifiable personal data, and AI tools are not used to make decisions about you.

1.5 AI system classification. The AI tools we use are minimal-risk support tools. They do not make automated decisions about you, do not use biometric data, and are used solely to support a human coach in creating content. All final decisions remain with a qualified human professional.

2. How we use your information

2.1 We collect and process your personal information to:

- provide and maintain our services and communicate with you about your coaching;
- respond to your enquiries and support requests;
- support the creation of coaching content using AI, based on anonymised information only;
- send our newsletter and marketing emails where you have given consent;
- seek your feedback and improve our website and services;
- comply with our legal obligations.

2.2 We will not use your personal data for purposes other than those set out in this policy without your consent.

2.3 Children. Our services are intended for adults aged 18 and over. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us and we will delete it.

3. Lawful basis for processing

We only process personal data where we have a lawful basis to do so. The bases we rely on are consent, contractual necessity, legal obligations, vital interests, and legitimate interests.

In most cases we process personal data on the basis of contractual necessity (to provide coaching services), consent (for our newsletter and marketing emails), legitimate interests (to improve services and respond to enquiries), and legal obligations (such as financial record-keeping).

4. Your rights

4.1 You have the following rights over your personal data:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object;
- rights in relation to automated decision-making and profiling.

More about these rights is available at ico.org.uk.

4.2 Marketing. You choose whether to receive marketing from us. We only send our newsletter and marketing emails to people who have opted in, and you can withdraw your consent or unsubscribe at any time using the link in any email or by contacting us. Withdrawing consent does not affect any processing carried out before you withdrew it.

4.3 You have the right to access, correct, or delete your personal information. If you believe any data is incorrect or incomplete, contact us using the details in section 10, and we will promptly correct it.

4.4 To exercise any of these rights, or for any question about your personal data, contact us using the details in section 10.

4.5 We do not use automated decision-making or profiling that produces legal or similarly significant effects. AI tools are used only to help generate draft coaching content; all outputs are reviewed and approved by a human coach, and all coaching decisions remain human-led.

4.6 Complaints to the ICO. You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk if you are unhappy with how we have handled your personal data. We ask that you raise any concern with us first, so we can try to put it right.

5. Data security

5.1 We use appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction.

5.2 No method of transmission over the internet or electronic storage is entirely secure, so we cannot guarantee absolute security of your information.

5.3 AI data protection measures. When using AI tools to support our work, we take steps to ensure names, email addresses, phone numbers, and other directly identifiable data are not entered into AI systems; only anonymised coaching themes, goals, or frameworks are processed; AI outputs are reviewed by a qualified human coach before use; and AI is used to enhance content quality, not to replace professional judgement.

6. Data sharing and disclosure

6.1 We do not sell your personal data. We use trusted third-party providers to run our business and deliver our services. They process personal data on our behalf under appropriate data protection agreements. Our current providers include:

- Wix - website hosting;
- Google Workspace - email;
- Cal.com - session booking and scheduling;
- MailerLite - newsletter and email marketing;
- Stripe, Xero - payment processing.

We may update these providers from time to time; you can request our current list by emailing us. If you contact us by WhatsApp, your messages are carried by WhatsApp (Meta) as the messaging provider. We may also disclose personal data where required to comply with legal obligations or lawful requests by public authorities.

6.2 AI providers. We may use third-party AI platforms to assist in generating coaching content. These platforms process only anonymised, non-identifiable information and do not receive your name, contact details, or other directly identifiable personal data.

6.3 Third-party links. Our website includes links to third-party websites. We do not control these sites and are not responsible for their privacy practices.

6.4 International transfers. Where we transfer personal data outside the UK, we ensure appropriate safeguards are in place - such as Standard Contractual Clauses, transfers to countries with a UK adequacy decision, or other legally recognised mechanisms. Some providers may process data outside the UK; we ensure such transfers comply with UK GDPR. For details about specific transfers, contact us at info@lumiveracoaching.co.uk.

7. Retention of personal data

7.1 We retain your personal data only for as long as necessary to fulfil the purposes in this policy, or until you ask us to delete it, unless a longer period is required or permitted by law. This includes anonymised content used for AI-supported coaching, which cannot be linked back to an identifiable individual.

7.2 We review our retention periods regularly. We are legally required to keep some information to meet our statutory obligations, such as records held for HM Revenue and Customs.

7.3 Coaching session records and client personal data are retained for a minimum of 2 years following the end of the coaching relationship, after which they are securely deleted or anonymised.

7.4 Newsletter and marketing contacts are kept until you unsubscribe or ask us to delete your details. Booking and enquiry information is kept only as long as needed to respond and provide our services.

8. Cookies and tracking technologies

8.1 Our website may use cookies and similar technologies to improve your experience. Where required by law, we obtain your consent before placing non-essential cookies on your device.

8.2 Cookies are small pieces of information stored on your device that help a website recognise you. They collect statistical data about browsing patterns and do not identify you as an individual. You can manage or switch off cookies through your browser settings, though some functionality may be lost as a result.

9. Data breach notification

In the event of a data breach, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of it, unless the breach is unlikely to result in a risk to your rights and freedoms. Where a breach is likely to result in a high risk to your rights and freedoms, we will also inform you without undue delay.

10. Contact us

For any question, concern, or request about this policy or your personal data, contact us at info@lumiveracoaching.co.uk. We are registered with the ICO under reference number 00016751226.

11. Updates to this policy

We may update this policy from time to time. Any changes are posted on this page with a revised date. By using our website, you agree to the current version of this policy.

Katarzyna Chini - Founder & Managing Director, Lumivera Coaching & Consulting Limited