

## Privacy and GDPR Policy

Effective Date: 15th January 2026

Lumivera Coaching is committed to protecting the privacy and confidentiality of your personal information. This Privacy Policy outlines how we collect, use, disclose, and protect the personal data you provide to us when using our website or services, and how we comply with the General Data Protection Regulation (GDPR) as applicable in the UK.

### 1. Information We Collect

**1.1. Personal Information:** We may collect personal information such as your name, email address, contact details, billing information, and other information necessary for providing our services that you consent to be provided on our website contact form.

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

### 1.3. AI Processing Data

We may use artificial intelligence (AI) technologies 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.

### 1.4. AI System Classification

Under the EU Artificial Intelligence Act, the AI tools we use are classified as "minimal risk" systems. They do not make automated decisions about you, do not use biometric data, and are used solely to support human coaches in creating personalised content. All final decisions remain with qualified human professionals.

### 2. Use of Information

**2.1. We collect and process your personal information for the following purposes:**

- To provide and maintain our services, to serve you and to communicate about the coaching or other services provided to you.
- To communicate with you regarding your inquiries, or support requests and that may be of interest to you for legitimate business purposes.

- To support the creation of coaching content and resources using AI technologies, based on anonymised, non-identifiable information only.
- To seek your feedback on the services we provide.
- To improve our website and services by analysing usage patterns and preferences.
- To comply with legal obligations.

2.2. We will not use your personal data for purposes other than those outlined in this Privacy Policy without obtaining your consent.

### 2.3 16 OR UNDER?

We are dedicated to protecting the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## 3. Lawful Basis for Processing

The Company will only process personal data when there is a lawful basis for doing so, which may include:

- Consent of the data subject
- Contractual necessity
- Legal obligations
- Vital interests
- Legitimate interests pursued by the Company

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

## 4. Your Rights

4.1. As the subject of personal data held about you, you have:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object

## 8. Rights in relation to automated decision making and profiling.

You can see more about these rights at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/>

4.2. You have a choice about whether you wish to receive information from us. If you do not want to receive direct marketing communications from us about our products, then you can select your choices by ticking the relevant boxes on our website contact form on which we collect your information. We will not contact you for marketing purposes by email unless you have given your prior consent. You can change your marketing preferences at any time by notifying us on our website contact form.

4.3. You have the right to access, correct, or delete your personal information held by us. If you believe that any data is incorrect or incomplete, please contact us using details in section 10. We will promptly correct any data found to be incorrect.

4.4. To exercise these rights or if you have any questions about your personal data, please contact us using the details provided 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 solely as a supportive aid to generate draft coaching content and task suggestions. All AI-generated outputs are reviewed, contextualised, and approved by a human coach, and all coaching decisions remain human-led.

## 5. Data Security

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

5.2. Despite our best efforts, no method of transmission over the internet or electronic storage is entirely secure. Therefore, we cannot guarantee absolute security of your information.

### 5.3. AI Data Protection Measures

When using AI technologies to support our services, we apply the following safeguards:

- We take steps to ensure that names, email addresses, phone numbers, or other directly identifiable personal data is not put into AI systems.
- Only anonymised coaching themes, goals, or frameworks are processed
- AI outputs are reviewed by a qualified human coach before use.

- AI is used solely to enhance content quality and efficiency, not to replace professional judgement.

## 6. Data Sharing and Disclosure

6.1. We do not sell your personal data. We may share personal data with trusted third-party service providers where necessary to operate our website and deliver our services (for example, website hosting, email communication, or payment processing). All such providers are required to process personal data in accordance with applicable data protection laws and under appropriate contractual safeguards.

We may also disclose personal data where required to comply with legal obligations or lawful requests by public authorities.

AI Service 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.

6.2 Third-party links. Our website includes links to third-party websites. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

6.3 Where we transfer personal data outside the UK, we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs) approved by the UK Information Commissioner's Office
- Transfers to countries with UK adequacy decisions
- Other legally recognised transfer mechanisms

Our AI service providers may process data outside the UK/EU. We ensure such transfers comply with UK GDPR requirements through appropriate contractual safeguards. For details about specific transfers, please contact us at [info@lumiveracoaching.co.uk](mailto:info@lumiveracoaching.co.uk).

## 6.4. AI-Specific Safeguards for International Processing

When using AI services that may process data outside the UK:

- We select providers with appropriate security certifications
- Standard Contractual Clauses govern data processing
- Only anonymised, non-identifiable information is processed through AI systems

- We conduct regular reviews of provider compliance with data protection standards

## 7. Retention of Personal Data

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

7.2. We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations, such as records that we keep for HM Revenue and Customs.

## 8. Cookies and Tracking Technologies

8.1. Our website may use cookies and similar tracking technologies to enhance your user experience. You have the option to accept or reject these cookies through your browser settings. Where required by law, we will obtain your consent before placing non-essential cookies on your device.

8.2 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. While cookies collect statistical data about your browsing actions and patterns, they do not identify you as an individual. This helps us to improve our website and deliver a better more personalised web user experience. It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

## 9. Data Breach Notification

In the event of a data breach, the Company will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of the breach, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals.

## 10. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our handling of your personal data, please contact us at [info@lumiveracoaching.co.uk](mailto:info@lumiveracoaching.co.uk)

We are registered with ICO with reference number 00016751226.

## 11. Updates to this Privacy Policy

We reserve the right to update or amend this Privacy Policy from time to time. Any changes will be posted on this page with an updated revision date. By using our website, you agree to be bound by this policy.

Last updated: 15th January 2026

*Katarzyna Chini*

*Founder & Managing Director*