

# Privacy Policy

How Jules Whale Life Coaching collects, uses and protects personal information

**Effective from 19 September 2026**

This policy replaces the previous website privacy policy dated March 2018.

This policy explains what personal information I collect, why I use it, how I keep it and the choices and rights you have. It applies to website visitors, people who contact me and clients of Jules Whale Life Coaching.

## 1. Who is responsible for your information

Jules Whale, trading as **Jules Whale Life Coaching**, is the data controller.

Contact: [jules@juleswhale.com](mailto:jules@juleswhale.com)

Address: **Bay House, Higher Ansty, Dorchester, DT2 7PR**

Website: [juleswhale.com](https://juleswhale.com)

I do not appoint a separate Data Protection Officer. Privacy questions and requests should be sent directly to me using the email address above.

## 2. Information I may collect

I collect only information that is reasonably needed to respond to you, manage the client relationship, provide the agreed service and meet my professional, insurance, tax and legal responsibilities.

- Your name, email address, telephone number and postal address where relevant.
- Enquiries, emails, WhatsApp messages and appointment information.
- Your completed Terms & Conditions acceptance form and your choice about beginning services during the 14-day cancellation period.
- Invoice, payment and accounting information. I use Zervant to create and email invoices; I do not need to hold your payment-card details.
- Written consultation and session notes, including the date, a brief description of the work and any unusual reaction or event.
- Information you choose to share about your goals, personal circumstances, lifestyle, physical health, mental health, treatment or medication where relevant to suitability and the agreed work.
- Technical website information such as IP address, browser, device and pages visited, where collected through essential website functions or permitted analytics and cookies.
- Newsletter preferences where you have chosen to subscribe.

## 3. Where the information comes from

Most information comes directly from you through the website, email, WhatsApp, telephone conversations, forms and sessions. If another person refers you, introduces us or pays for your work, I may receive basic contact or booking information from them. I will explain this where appropriate and will not assume that the referrer or payer

is entitled to confidential information about you.

## 4. Why I use information and my lawful bases

Data-protection law requires a lawful basis for each use of personal information. The bases I normally rely on are:

| Purpose                                                                                                 | Lawful basis                                                                                                       |
|---------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Responding to enquiries and taking steps towards a booking                                              | Steps requested before entering a contract                                                                         |
| Booking, delivering and administering services                                                          | Performance of our contract                                                                                        |
| Invoices, tax and accounting records                                                                    | Contract and legal obligation                                                                                      |
| Keeping appropriate client records, maintaining security and managing or defending complaints or claims | Legitimate interests, legal obligation and the establishment, exercise or defence of legal claims where applicable |
| Optional newsletters and marketing                                                                      | Consent; you may unsubscribe at any time                                                                           |
| Website security and essential operation                                                                | Legitimate interests; consent is used where required for non-essential cookies                                     |

## 5. Health and other sensitive information

Health and mental-health information may be special-category personal data and receives additional protection. I use information you choose to provide only where it is relevant to suitability, safety and delivery of the agreed service.

I normally rely on your **explicit consent** as the special-category condition for this use. You can withdraw that consent by emailing me, although I may then be unable to continue providing the service safely. Withdrawal does not affect use that was lawful before withdrawal and does not prevent limited retention where information is required for legal claims, insurance or another legal obligation.

I may also use relevant information where necessary for the establishment, exercise or defence of legal claims.

## 6. How information is stored and protected

Paper consultation and session notes are stored in a locked drawer in my private office. Electronic information may be held in password-protected email, WhatsApp, my devices and the systems used to administer the service. Zervant is used to create and email invoices.

I take reasonable steps to limit access, use passwords and device security, keep physical records locked and avoid collecting more information than is needed. No internet or messaging system can be guaranteed completely secure, so please avoid sending information that is unnecessary for our work.

## 7. Who information may be shared with

I do not sell personal information. I share it only where reasonably necessary, including with:

- Service providers supporting email, website hosting, invoicing through Zervant, video calls, secure storage, IT or newsletter delivery.
- Professional advisers, my insurer or legal representatives where needed to manage or defend a claim.

- A professional supervisor or consultant supporting safe and ethical practice; identifying details are removed or minimised wherever reasonably possible.
- Police, courts, regulators, safeguarding bodies or other authorities where required by law or where disclosure is reasonably necessary in relation to a serious risk of harm or safeguarding concern.

A sponsor, partner, employer, referrer or person paying the fee does not automatically receive session content, notes or progress information. I will share this only with your clear permission or where the law requires it.

## 8. Information processed outside the UK

Some technology providers may process information outside the United Kingdom. Where this happens, I take reasonable steps to use established providers and rely on appropriate legal safeguards or adequacy arrangements required by UK data-protection law.

## 9. How long information is kept

I follow the record-keeping requirements of my professional insurer, Holistic Insurance Services:

- Client consultation records, relevant session notes, completed acceptance forms and communications forming part of the client record are normally kept for **five years after the final session or the end of the working relationship**.
- Invoices and accounting information are kept for the period required by tax and accounting law.
- Enquiries that do not become client relationships are normally kept for no more than 12 months unless there is a clear reason to retain them longer.
- Newsletter details are kept until you unsubscribe or the mailing list is no longer used.

Information may be kept longer where reasonably necessary for a complaint, legal claim, safeguarding matter or legal obligation. When information is no longer required, it is securely deleted or destroyed.

## 10. Your data-protection rights

Depending on the circumstances, you may have the right to:

- Ask for a copy of your personal information.
- Ask for inaccurate information to be corrected.
- Ask for information to be deleted or its use restricted.
- Object to certain uses, including direct marketing.
- Receive certain information in a portable format.
- Withdraw consent where consent is relied upon.

These rights are not all absolute and may depend on the lawful basis and the circumstances. Requests should be emailed to [jules@juleswhale.com](mailto:jules@juleswhale.com). I will normally respond within one month and will not usually charge a fee.

## 11. Cookies and website information

Cookies are small files placed on a device to support website functions and, where permitted, understand how the site is used. Details of the cookies used and the available choices are provided in the separate Cookie Policy or cookie settings on [juleswhale.com](https://juleswhale.com).

## 12. Complaints

Please contact me first at [jules@juleswhale.com](mailto:jules@juleswhale.com) if you have a privacy concern so that I can try to resolve it. You also have the right to complain to the Information Commissioner's Office at **ico.org.uk** or by calling **0303 123 1113**.

### 13. Changes to this policy

I may update this policy when my services, systems or legal obligations change. The latest version will be posted on [juleswhale.com](https://juleswhale.com) with its effective date. Material changes affecting existing clients will be brought to their attention where appropriate.

#### **Privacy contact**

Jules Whale Life Coaching

[jules@juleswhale.com](mailto:jules@juleswhale.com)

Bay House, Higher Ansty, Dorchester, DT2 7PR