

## Privacy Policy

### Introduction

This Privacy Policy explains how Be Business Fit Ltd (“we”, “us”, or “our”) processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all other applicable UK data protection legislation. This policy outlines what personal data we collect, how and why we process it, the lawful bases we rely on, and your rights as a data subject.

### 1. Who We Are

Be Business Fit Ltd is a UK-based provider of executive coaching, HR support, advice, and consultancy services. In the course of delivering our services to client organisations, we may process personal data relating to their employees, stakeholders or contractors.

Be Business Fit Ltd acts as the **data controller** when processing personal data for its own business purposes (e.g. marketing, client communications). When processing data on behalf of our clients (e.g. information about their employees), we act as a **data processor**.

- **Email:** [hello@bebusinessfit.co.uk](mailto:hello@bebusinessfit.co.uk)
- **Registered in England and Wales** (Company Number 12587872)
- **Registered address:** Lambourne House, Lambourne Crescent, Llanishen, Cardiff, CF14 5GL

### 2. The Data We Collect

We may collect and process the following categories of personal data, depending on the context of your engagement with us:

- **Contact details:** Name, email address, phone number, job title
- **Employment-related information:** Department, line manager, organisational role
- **Information shared in coaching or HR sessions,** including views, experiences, goals or challenges
- **Audio recordings** of coaching or consultation meetings (with consent or legitimate interest), securely stored and deleted once the purpose is fulfilled
- **Special Category Data,** such as health-related or diversity information, where shared by the client for HR consultancy purposes

- **Survey responses** via Microsoft Forms
- **Website usage data**, including cookies, IP address and browser data

**Lawful bases for processing** may include:

- **Performance of a contract** – where processing is required to deliver agreed services
- **Legitimate interests** – such as improving services, maintaining records, or internal analysis (we carry out Legitimate Interests Assessments to ensure fairness)
- **Consent** – used for marketing, surveys, and optional recordings (we maintain a record of consent where obtained)
- **Legal obligations** – to comply with regulatory or statutory duties

### 3. How We Use Personal Data

We use personal data only where a lawful basis exists. Our processing activities include:

- **Providing HR and coaching services** to client organisations and their staff (Contractual necessity and/or legal obligation)
- **Understanding and supporting staff performance, development**, development, and team effectiveness (Contractual necessity)
- **Communicating with clients, prospects, and suppliers** (Contractual and/or Legitimate interest)
- **Recording and analysing coaching sessions**, where recordings are required to improve accuracy and delivery (Contractual and/or Legitimate interest or consent)
- **Carrying out market research surveys** (Consent or legitimate interest)
- **Meeting legal or regulatory requirements** (Legal obligation)

Where a client provides **Special Category Data** (e.g. data concerning health or ethnicity) about their employees, Be Business Fit Ltd processes such data strictly for the purpose of fulfilling contractual obligations and in accordance with *Article 9(2)(b) of the UK GDPR*. Appropriate safeguards and access controls are in place.

Where reasonably possible, and once contact details are available, we will provide individuals with access to this Privacy Policy to ensure transparency.

We do not carry out automated decision-making or profiling that has legal or similarly significant effects on individuals.



#### 4. Sharing Your Data

We may share data only where necessary and always under controlled circumstances. This includes:

- **Interns, staff or subcontractors** – subject to strict confidentiality and training requirements
- **Third-party IT and cloud service providers** – under Data Sharing Agreements to ensure data security
- **Clients** – where we act as a processor and need to report or collaborate
- **Legal authorities** – if required to comply with a legal obligation

All data sharing in and out of Be Business Fit Ltd is governed by a formal Data Sharing Agreement where appropriate and possible.

#### 5. Data Security

We are committed to protecting personal data using appropriate organisational and technical measures. This includes:

- Access restricted to authorised, trained staff and interns
- Use of encryption and secure servers for data transmission and storage
- A trusted third-party IT security provider manages and monitors our systems
- Audio recordings are retained only for the duration of the project and securely deleted once no longer required

#### 6. International Transfers

If we transfer personal data outside the UK, we ensure appropriate safeguards are in place, such as UK International Data Transfer Agreements (IDTAs) or the UK Addendum to the EU Standard Contractual Clauses, to ensure an adequate level of protection in line with UK data protection law.

#### 7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes we collected it for, including legal, tax, or contractual obligations. We have reviewed all categories of personal data we collect and hold, and each has a defined retention period set against it in line with our data retention policy. Audio recordings are deleted promptly once no longer required.

#### 8. Your Rights

Under UK data protection law, you have the right to:



- **Access** – know what personal data we hold about you
- **Rectification** – request correction of inaccurate or incomplete data
- **Erasure** – request deletion in certain circumstances
- **Restriction** – ask us to limit our processing of your data
- **Portability** – request your data in a commonly used format
- **Object** – to processing based on legitimate interests or for direct marketing
- **Withdraw consent** – at any time, where processing is based on consent
- **Lodge a complaint** – with the Information Commissioner’s Office (ICO):
  - Website: [www.ico.org.uk](http://www.ico.org.uk)
  - Tel: 0303 123 1113

## 9. Cookies and Website Use

Our website uses cookies to improve functionality and understand visitor behaviour. You can manage cookie preferences through your browser settings. For more details, please see our Cookie Policy.

## 10. Contact Us

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

- **Email:** [hello@bebusinessfit.co.uk](mailto:hello@bebusinessfit.co.uk)
- **Post:** Lambourne House, Lambourne Crescent, Llanishen, Cardiff, CF14 5GL

## Version 2.0 – Last updated: June 2025

We commit to notifying all Data Subjects we have up-to-date records for whenever we update this Policy.

