# Privacy Policy

*Effective: October 2026*

## 1. About This Privacy Notice

This Privacy Notice explains how personal information is collected, used, stored and protected in connection with Inner Performance Coaching for Ballet Dancers, provided by Helen Allen.

For the purposes of this Privacy Notice, “the Coach” means Helen Allen; “the dancer” means the person participating in the coaching programme; and “parent/guardian” means the parent or legal guardian of a dancer under 18.

This Privacy Notice applies to dancers participating in the programme and, where the dancer is under 18, to personal information relating to her parent/guardian and other relevant contacts. Helen Allen is the data controller responsible for the personal information used in providing and administering the coaching service.

## 2. What Personal Information Is Collected

The Coach collects only personal information that is reasonably needed to provide and administer the coaching programme safely and effectively.

- The dancer’s name, date of birth, age and contact details;
- Parent/guardian contact details where the dancer is under 18;
- Emergency contact details;
- Enrolment, programme and payment information;
- Relevant communications relating to the coaching programme;
- Brief and proportionate coaching notes needed to support continuity and delivery of the coaching;
- Information voluntarily shared by the dancer, or by a parent/guardian, where it is relevant to the coaching or the dancer’s welfare; and
- Safeguarding information where a concern arises.

The Coach does not routinely make a detailed record of what a dancer shares during coaching sessions. Coaching notes are not transcripts and will not include unnecessary personal information.

## 3. Why Personal Information Is Used

The Coach uses personal information only where it is reasonably necessary for the coaching service and the operation of the programme.

- Enrol and administer the dancer’s programme;
- Arrange and deliver coaching sessions;
- Communicate with the dancer and, where applicable, her parent/guardian;
- Provide appropriate between-session support and programme materials;
- Maintain continuity between coaching sessions;
- Manage payments and programme administration;
- Support the dancer’s safety and welfare;
- Respond appropriately to a safeguarding concern;
- Respond to a concern or complaint; and
- Meet legal, insurance or other professional obligations.

Personal information collected for the coaching relationship will not be used for unrelated purposes without an appropriate lawful reason.

## 4. Sensitive Personal Information

During the coaching programme, the dancer or her parent/guardian may share information of a sensitive or personal nature. This may include information concerning the dancer's physical or emotional wellbeing or other circumstances relevant to her coaching.

The Coach will only record sensitive personal information where it is reasonably necessary for the safe and effective delivery of the coaching, safeguarding, or another legitimate professional or legal purpose. Information shared during a coaching conversation will not automatically be recorded simply because it has been discussed.

Where sensitive information is recorded, it will be handled with particular care and only shared where there is a lawful and necessary reason to do so.

## 5. Confidentiality

The content of coaching sessions is confidential, subject to the safeguarding, legal and professional exceptions explained in the programme documentation.

For dancers under 18, a parent/guardian may receive information where necessary for programme administration, to support the dancer's participation, or where there is a safeguarding or other lawful reason for sharing it. Safeguarding information will be handled in accordance with the Safeguarding Policy.

## 6. Data Security

Personal information and coaching records are stored securely and protected against unauthorised access. Electronic client records are password protected and securely backed up. Access to identifiable coaching records is limited to the Coach, except where access or disclosure is required for safeguarding, legal, insurance or another legitimate professional purpose.

## 7. Third-Party Online Services

The Coach may use third-party online services to support programme administration, communications, electronic signing, payment and delivery. Those providers process information under their own privacy and security arrangements and, where they act as processors for the Coach, are used subject to appropriate data-protection arrangements. Information will only be shared with a provider where it is reasonably necessary for the relevant service.

## 8. Legal Basis for Using Personal Information

The lawful basis depends on why the information is being used. The Coach relies on the following bases where they apply:

- Contract – where processing is necessary to enter into or perform a contract with the individual concerned. For an adult dancer this may include enrolment, programme delivery, communications and payment administration.
- Legitimate interests – where processing is necessary to provide, administer and protect the coaching service and those interests are not overridden by the individual's rights and interests. This is particularly relevant to information about a dancer under 18 where the contract is with her parent/guardian, and to proportionate records needed for continuity, service administration,

complaints and protection of legal rights. The Coach gives particular weight to the rights and interests of children.

- Legal obligation – where information must be processed or retained to comply with a legal requirement, including relevant financial and tax obligations.
- Recognised legitimate interest or another appropriate lawful basis – where processing or sharing is necessary to safeguard a child or another vulnerable individual.

Where information is special-category personal data, such as information concerning health, an additional condition under Article 9 of the UK GDPR is also required. Depending on the purpose and

circumstances, this may include explicit consent, the establishment, exercise or defence of legal claims, or the substantial-public-interest condition for safeguarding children and individuals at risk. Where the safeguarding condition requires an Appropriate Policy Document, the Coach maintains the required internal documentation.

The Coach does not rely on consent where another lawful basis is more appropriate, particularly where information needs to be used or shared to protect a child.

## 9. How Long Personal Information Is Kept

Personal information is kept only for as long as there is a clear reason to retain it. Different categories of records have different retention periods:

- Routine coaching notes – normally for three years after the programme ends for an adult dancer. Where the dancer was under 18, normally until her 21st birthday, or three years after the programme ends if that is later. Notes are kept brief and proportionate and are reviewed before retention beyond those periods.
- Enrolment, consent, contractual records and relevant programme communications – normally for six years after the coaching relationship ends, unless there is a reason requiring a longer or shorter period.
- Financial and payment records – for the period required by HMRC. For a self-employed business this is generally at least five years after the 31 January Self Assessment submission deadline for the relevant tax year.
- Safeguarding records – kept separately from routine coaching records and retained for as long as is necessary having regard to the nature of the concern, safeguarding responsibilities, any advice or referral, and the need to protect the individuals involved. They are reviewed rather than retained indefinitely without justification.
- Complaints, incidents or potential legal or insurance claims – retained for as long as reasonably necessary to deal with the matter and establish, exercise or defend legal rights.

At the end of the relevant retention period, information is securely deleted or anonymised unless there is a clear and documented reason to keep it for longer.

## 10. Your Data Protection Rights

You have rights in relation to your personal information. Depending on the circumstances, these may include the right to ask for access to your information, have inaccurate information corrected, ask for information to be erased or its use restricted, object to certain processing, and receive certain information in a portable form.

These rights are not absolute and may depend on the lawful basis and reason for holding the information. For example, some information may need to be retained or withheld where this is necessary for safeguarding, legal obligations or the protection of another person's rights.

If you wish to ask about your personal information or exercise a data-protection right, please contact Helen Allen at helen@helenallen.co.uk.

## 11. Data Protection Complaints

If you have a concern about how your personal information has been handled, please contact Helen Allen at helen@helenallen.co.uk. Your concern will be handled as a data-protection complaint where appropriate.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK regulator for data protection:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
**Helpline:** 0303 123 1113
**Website:** ico.org.uk