CAROLINE MASON COACHING

Privacy Notice: Seeds to Thrive Ltd trading as Caroline Mason Coaching (November 2026)

Effective date: 18 November 2026

1. Who we are and what this Notice covers

Seeds to Thrive Ltd, trading as Caroline Mason Coaching, is the controller of personal data described in this Privacy Notice. This means we decide why and how that personal data is processed.

This Notice explains how we collect, use, store and share personal data in connection with our website, services and business activities. It applies to:

- website visitors and people who contact us with an enquiry;
- individual coaching clients, including clients on **The Invisible Compass: Gold** package;
- team coaching, workshops and Compassionate Leadership Training participants;
- participants in ILLUMINATE and any future retreat;
- people booking or staying at the Hideaway, Lodge or Bunkhouse at Rhiw Goch;
- people who download a free resource, such as the Coaching Compass workbook;
- newsletter subscribers and people who book through our website or directly by email, message or payment link; and
- organisations, sponsors and other third parties that fund or arrange coaching or a place for an individual.

This Notice is informational. It is not a contract and does not replace a coaching agreement, retreat booking terms or an Activity, Health & Safety Acknowledgement. **You do not need to sign it.**

2. The personal data we collect

The personal data we collect depends on how you interact with us. It may include:

a) **Identity and contact details:** your name, preferred name, email address, telephone number, postal address, country of residence, job title and organisation, where relevant.

b) **Enquiries and correspondence:** the information you provide in an enquiry or other communication, and records of relevant calls, feedback and complaints.

c) **Coaching information:** coaching goals and areas of focus recorded in a coaching agreement, notes, reflections, agreed actions, written summaries and, where you separately agree, session recordings and transcripts.

d) **Contracting information:** names and contact details of the parties to an agreement, sponsor and sponsored client details, purchase order references where required by an organisation, fees, invoices and payment status.

e) **Retreat and accommodation bookings:** the retreat or stay selected, accommodation or room type, arrival and departure dates, deposits, instalments and balances, cancellations, transfers and related arrangements.

f) **Dietary information:** dietary requirements, allergies and intolerances, where needed for catering and safety. Information about a preference is not necessarily health data, but information that reveals a health condition may be special category data.

g) **Accessibility and mobility information:** information you provide so we can consider reasonable adjustments and plan participation safely, including access to the woodland and land and access arrangements at the Lodge and Hideaway.

h) **Health and medical information:** only where you choose to provide it and where relevant to safe participation, emergency planning or appropriate support.

i) **Emergency contact details:** an emergency contact's name, relationship to you and telephone number.

j) **Photography, recording and transcription preferences:** your separate choices about photography and marketing use, and any separate choice about recording or transcribing a session.

k) **Marketing information:** your preferences, subscription status and, where applicable, email engagement information such as opens and clicks.

l) **Free resource information:** which resource you requested, such as the Coaching Compass workbook, and the relevant group or list used to deliver it.

m) **Technical and website information:** information such as IP address, device and browser details, pages visited, and cookie or analytics data, depending on the website tools and settings in use.

n) **Financial information:** invoice details, transaction references, payment amounts and dates. We do not hold full card details; these are processed by the relevant payment provider.

3. Where we get personal data from

We may obtain personal data:

- directly from you, including through website forms, booking forms and payment links;
- by email, telephone, message or social media;
- during coaching sessions and in connection with retreat, workshop or accommodation administration;
- from booking, payment, website or email service providers;
- from accommodation, venue or catering providers where needed to make arrangements;
- from an organisation funding, sponsoring or arranging coaching or a place;
- from a colleague, assistant or other person acting on your behalf; and
- through website and email analytics, where these are in use.

If we receive your personal data from someone else, we will provide privacy information as required by law. Where appropriate, we will tell you the source of the information.

4. How we use personal data

We use personal data for the following purposes:

a) to respond to enquiries and communicate with you;

b) to provide coaching, including The Invisible Compass: Gold, one-to-one coaching, team coaching, workshops and Compassionate Leadership Training, and to prepare session notes, summaries, workbooks and supporting materials;

c) to administer sponsored or third-party-funded coaching, including invoicing the sponsor and keeping administrative records, without disclosing the substance of coaching;

d) to administer retreat bookings, including confirming places, deposits, instalments and balances, handling cancellations or transfers, and sending essential information about ILLUMINATE and any future retreat;

e) to administer accommodation bookings at the Hideaway, Lodge and Bunkhouse, including separate accommodation invoices where applicable;

f) to arrange catering and accommodation, consider reasonable adjustments, plan safe participation and respond to emergencies;

g) to process payments and issue invoices and receipts, and to maintain accounting records;

h) to meet legal, regulatory, tax, insurance and safeguarding obligations;

i) to administer and protect our business, keep records, maintain security, improve our services, prevent fraud and establish, exercise or defend legal claims; and

j) to send marketing communications where we have a lawful basis to do so, and to deliver free resources you have requested.

We do not sell personal data. We do not use identifiable disclosures made in coaching for publicity, case studies or testimonials without permission.

5. Our lawful bases

Under the UK GDPR, we rely on one or more of the following lawful bases, depending on the purpose:

a) **Contract:** where processing is necessary to enter into or perform an agreement with you, such as delivering coaching, a retreat, workshop or accommodation booking.

b) **Legitimate interests:** where processing is necessary for our legitimate business interests, such as responding to enquiries, administering bookings, maintaining business records, protecting our services and systems, improving our services, or establishing or defending legal claims. We consider your rights and interests when relying on this basis.

c) **Legal obligation:** where processing is necessary to meet legal requirements, including applicable tax and accounting obligations.

d) **Vital interests:** where processing is necessary to protect someone's vital interests, for example in an emergency.

e) **Consent:** where you have given a clear choice, for example for optional marketing, photography and marketing use of images, recording or transcription where consent is appropriate, or special category data where we rely on explicit consent.

Where we rely on consent, you can withdraw it at any time. Withdrawal does not affect processing carried out lawfully before you withdrew it.

6. Health, accessibility and other special category data

Some personal data, including certain health, medical and accessibility information, is special category data under data protection law. Dietary information is special category data only where it reveals information about your health or medical condition.

We collect only information that is necessary and proportionate for purposes such as dietary arrangements, accessibility and reasonable adjustments, activity and retreat safety, emergency planning and delivering services safely. We ask for practical information, not diagnoses or detailed medical histories.

Where practicable, we keep this information separate from general booking information, limit access to people who need it, share only the minimum necessary with relevant suppliers, and retain it only for as long as needed.

Where we rely on explicit consent to process special category data, we will ask for that consent separately. You can withdraw it. If you decline or withdraw consent, we may be unable to make a particular adjustment or support your safe participation in a particular activity. We will explain any practical consequences.

For coaching, you are not asked to provide health information and coaching does not require it. If you choose to mention health information during a coaching session, we will not record it in coaching notes, transcripts or summaries. This does not prevent us from taking necessary action in an emergency or where another lawful basis applies.

Please provide only information relevant to the arrangements. You do not need to provide diagnoses or detailed medical histories.

7. Recording, transcription and AI tools

Coaching and retreat sessions are not automatically recorded.

Where an AI meeting assistant, currently Fathom or a comparable provider, may be used to record and transcribe an online one-to-one or integration session, we will do so only where the client agrees in advance. The client may decline or withdraw agreement, including before or during a session, without affecting the coaching or its fee. If recording is declined, written notes will be taken instead.

In-person coaching sessions are not recorded. We may prepare written notes and summaries, sometimes with the assistance of AI tools. The Coach reviews and edits AI-assisted output and remains responsible for its content.

We do not enter information identifying a client into general-purpose AI tools, and client content, recordings, transcripts and summaries are not used to train AI models. Retreat group sessions are not recorded or transcribed.

Before using a recording or transcription tool, we check the provider’s terms, security settings, deletion controls, processing and storage locations, and any international transfer arrangements. We will tell clients and participants what is being recorded, why, where it is processed and what choices are available.

8. Who we share personal data with

We may share personal data, where necessary and appropriate, with:

a) **Service providers:** providers supporting email and newsletters, including MailerLite; payment and banking providers, including Stripe and Monzo where used; WordPress hosting, form, booking and plugin providers; email and cloud storage providers; accounting and administration support; IT and security providers; and Fathom or a comparable meeting assistant only where used and where the client has agreed. The role of each provider depends on the service it provides.

b) **Accommodation, venue, catering and activity providers:** where necessary to deliver a booking, confirm arrangements, communicate relevant dietary or accessibility information, or plan for safety.

c) **Sponsors of sponsored coaching:** unless otherwise agreed in writing with the sponsored client, we may share only limited administrative information: the number of sessions scheduled,

attended and outstanding, and whether the engagement is continuing. We will not share the date, time, venue or location of an individual session, or coaching content, notes, recordings, transcripts or summaries, unless the sponsored client gives specific written permission or disclosure is otherwise permitted or required by law.

d) **Professional advisers:** insurers, accountants, solicitors and other advisers where necessary for business, insurance, legal or accounting purposes.

e) **Authorities and emergency services:** where legally required or where necessary to protect someone's vital interests in an emergency.

f) **The International Coaching Federation (ICF):** only where the Sponsor and Sponsored Client have separately opted in to verification of the coaching relationship. If they do, we may provide the names and contact details of the relevant parties and the start and end dates of the engagement for verification. We will not provide session notes or coaching content for this purpose.

We do not sell personal data.

9. International transfers

Some suppliers may process personal data outside the UK. Before using them, we check the relevant transfer arrangements and put appropriate safeguards in place where required. Safeguards may include a UK adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or other appropriate contractual, technical and organisational measures.

The locations and safeguards depend on the suppliers used and may change. We review them when relevant suppliers or services change. An organisation may contact us to request further details of the safeguards relied on.

10. How long we keep personal data

We keep personal data only for as long as needed for the purposes described in this Notice, taking account of legal, accounting, insurance, professional and dispute-resolution requirements.

Our general retention periods are:

a) **Booking, payment, invoicing and accounting records:** generally at least six years to meet applicable accounting and tax requirements.

b) **Coaching agreements, goals and contracting records:** for the term of the agreement and generally at least six years afterwards.

c) **Coaching notes, session summaries, recordings, transcripts and AI-assisted summaries:** generally at least one year after the end of the coaching agreement or retreat, then deleted or anonymised. We may keep relevant records longer where necessary for a complaint, claim or insurance matter.

d) **Retreat and accommodation safety, accessibility and dietary information:** only for as long as necessary to plan and deliver the service safely and to deal with relevant follow-up needs or an incident.

e) **Marketing information:** until you unsubscribe or opt out. We may keep a limited record of your preference so we can respect your opt-out.

f) **Website, cookie and analytics information:** according to the retention settings of the relevant tools.

When data is no longer needed, we delete it securely or anonymise it.

11. How we protect personal data

We use reasonable technical and organisational measures to protect personal data. Depending on the information and service, these may include password protection, multi-factor authentication where available, access controls, secure cloud services, appropriate sharing permissions, encryption where available, device security, secure disposal, supplier checks and incident response procedures.

No method of transmitting or storing information is completely secure. If a personal data breach occurs, we assess it and take any action required by data protection law, including notifying the Information Commissioner's Office and affected individuals where required.

12. Service communications and marketing

12.1 Essential service communications

If you book coaching, a retreat, workshop or accommodation, we will send the administrative and logistical messages needed to deliver it. These may include schedules, joining details, information about what to bring, venue information, safety information and invoices. These are service messages, not marketing, and may be necessary to provide the service you booked.

12.2 Marketing and free resources

We send newsletters and updates about coaching, retreats and related services only where we have a lawful basis to do so. Booking coaching, a retreat or accommodation does not automatically subscribe you to general marketing.

If you request a free resource such as the Coaching Compass workbook, we will send the resource you requested. We will send related marketing updates only where you have separately chosen to receive them or where another applicable legal exception permits it. Any form asking for that choice should make clear what updates you will receive.

Every marketing email will include an unsubscribe option. You can also change your preferences or opt out by emailing caroline@carolinemasoncoaching.co.uk. Opting out of marketing does not affect a service you have booked.

13. Cookies

Our website may use cookies and similar technologies to operate essential functions, remember preferences, understand website usage, improve performance and measure marketing.

Where consent is required for non-essential cookies or analytics, we will request it through the website's cookie mechanism. You can manage cookies through your browser settings, although blocking some cookies may affect website functionality.

14. Your rights

Subject to the conditions and exemptions in data protection law, you may have the right to:

- request access to your personal data;
- ask us to correct inaccurate or incomplete data;
- request erasure of your data;
- ask us to restrict processing;

- object to processing based on legitimate interests;
- object to direct marketing;
- request data portability, where applicable; and
- withdraw consent where we rely on consent.

These rights depend on the lawful basis and circumstances. For example, we may need to keep certain financial or legal records even if you request erasure.

You can make a request by emailing caroline@carolinemasoncoaching.co.uk. We may need to verify your identity. We normally respond within one month. Where a request is complex or numerous, the response period may be extended by up to a further two months, and we will explain this to you.

You may also complain to the Information Commissioner's Office. Contact details are in Section 16.

15. Withdrawing consent

Where we rely on consent, you can withdraw it at any time by contacting us. Withdrawal does not affect processing carried out lawfully before the withdrawal.

We may still need to keep information to meet a legal obligation, establish or defend a legal claim, or maintain a record of your objection or preference. If you withdraw consent to the processing of health or accessibility information, we may be unable to provide a particular adjustment or support participation in a particular activity. We will explain the practical consequences.

16. Questions and complaints

If you have a question or concern about how we handle personal data, please contact us first at caroline@carolinemasoncoaching.co.uk.

You can also complain to the Information Commissioner's Office at ico.org.uk or by telephone on 0303 123 1113.

17. Children

Our coaching, retreats and related services are intended for adults. We do not knowingly collect personal data from people under 18 for coaching, retreats or marketing. If you believe a child has provided personal data to us, please contact us so we can assess the circumstances and, where appropriate, delete it.

18. Automated decision-making

We do not make decisions about individuals that produce legal or similarly significant effects solely by automated means.

We may use basic email and website analytics to understand engagement and improve communications. These do not determine eligibility for coaching, retreats or other services. If this changes, we will update this Notice.

19. Changes to this Notice

We may update this Notice to reflect changes to our services, suppliers, legal requirements, technology or data processing. We will update the effective date when we make material changes and may notify affected individuals directly where appropriate.

20. Contact us

Seeds to Thrive Ltd trading as Caroline Mason Coaching
New Haven, Ford
Shrewsbury, Shropshire
SY5 9LE
United Kingdom
Email: caroline@carolinemasoncoaching.co.uk
Telephone: 07968 501954