



GROUNDING FUTURES

GUIDING YOUR NEXT CHAPTER
THROUGH REFLECTION

DATA PROTECTION & PRIVACY POLICY

Grounded Futures Trading name of AVJ Coaching and Consultancy Ltd (Company No. 16964022)

1. Purpose This policy explains how Grounded Futures collects, uses, stores, and protects personal information. It ensures compliance with data protection legislation and promotes transparency in how client information is handled.
2. Scope This policy applies to all personal data collected or processed by Grounded Futures during enquiries, sessions, communication, or professional activity. It covers data relating to clients, prospective clients, and any individuals whose information is shared during sessions.
3. Legal Basis for Processing Grounded Futures processes personal data under the following lawful bases:
 - Consent (where clients voluntarily provide information)
 - Legitimate interests (to deliver reflective support services)
 - Legal obligation (safeguarding, record keeping, or statutory requirements)
4. Information Collected Grounded Futures may collect:
 - Contact details
 - Background information relevant to reflective support
 - Notes from sessions
 - Information shared during enquiries
 - Safeguarding information where necessary Grounded Futures does not collect unnecessary or excessive information.
5. How Information Is Used Personal data is used to:
 - Deliver reflective support sessions

- Communicate with clients
 - Maintain accurate records
 - Respond to safeguarding concerns
 - Meet legal and professional obligations Grounded Futures does not use personal data for marketing or share it with third parties except where legally required.
6. Confidentiality and Information Sharing Information is kept confidential except where:
- A child or vulnerable adult is at risk
 - A crime may have been committed
 - Disclosure is required by law
 - Statutory agencies request information for safeguarding purposes Information is shared only when necessary and proportionate.
7. Data Storage and Security Grounded Futures will:
- Store data securely
 - Use password-protected systems
 - Limit access to authorised persons only
 - Keep safeguarding records separate from general notes
 - Protect data from loss, misuse, or unauthorised access
8. Data Retention Personal data will be retained only for as long as necessary to fulfil professional, legal, and safeguarding obligations. Retention periods will be reviewed regularly and data will be securely deleted when no longer required.
9. Client Rights Clients have the right to:
- Access their personal data
 - Request corrections
 - Request deletion (where legally appropriate)
 - Withdraw consent (where applicable) Requests will be handled in line with data protection legislation.
10. Breaches of Data Protection Any data breach will be managed promptly and transparently. Grounded Futures will:
- Assess the breach

- Take steps to reduce impact
- Inform affected individuals where appropriate
- Review procedures to prevent recurrence

11. Policy Review This policy will be reviewed annually or sooner if legislation or service needs change.