

Privacy Policy Inner Wellbeing Coach

Last updated: 22nd of December 2025

1. Who we are

This privacy policy applies to:

Practice name: Inner Wellbeing Coach

Legal form: Sole trader (zzp)

Country of establishment: The Netherlands

Business Registration number: 82864292

Email: innerwellbeingcoach@gmail.com

Website: www.innerwellbeingcoach.com

For the purposes of the General Data Protection Regulation (GDPR / AVG), we are the data controller.

2. What personal data we process

We process personal data that you provide to us directly, including:

- Name, email address, phone number
- Date of birth
- Invoicing details
- Intake information
- Therapy notes
- Communication related to your sessions
- Information concerning your mental health (special category data)

We only collect data that is necessary for providing therapy and related administrative purposes.

3. Purpose and legal basis for processing

Your personal data is processed for the following purposes:

- Providing psychological therapy or coaching
- Managing appointments and communication
- Maintaining client records
- Invoicing and administration

- Complying with legal and professional obligations

The legal bases under GDPR are:

- Performance of a contract (therapy services)
- Explicit consent (for processing health data and online sessions)
- Legal obligation (administration and tax requirements)

4. Special category (health) data

Therapy involves processing special category personal data under Article 9 GDPR.

This data is processed only with your explicit consent and handled with appropriate confidentiality and security measures.

5. Online sessions

Online sessions may take place via Zoom, a video-conferencing provider.

- Zoom acts as a data processor
- A Data Processing Agreement (DPA) is in place
- Sessions are not recorded
- Security measures such as passwords, waiting rooms and encryption are used

Zoom is a US-based company. Personal data may be transferred outside the EU under Standard Contractual Clauses (SCCs) and additional safeguards.

You may request an alternative (e.g. phone or in-person session) at any time.

6. Sharing of personal data

Your data is not shared with third parties, unless:

- This is necessary for the provision of services (e.g. video platform)
- Required by law
- You have given explicit consent

Your data is never sold or used for marketing purposes.

7. Data retention

Personal data is retained no longer than necessary.

- Client records are retained in line with professional and legal requirements
- Invoicing data is retained according to Dutch tax law
- Video sessions are not recorded or stored

8. Security measures

We take appropriate technical and organisational measures to protect your data, including:

- Secure devices and passwords
- Encrypted communication where possible
- Restricted access to client information
- No cloud storage of therapy recordings

9. Your rights

Under the GDPR, you have the right to:

- Access your personal data
- Rectification of incorrect data
- Erasure (where legally possible)
- Restriction of processing
- Data portability
- Withdraw consent at any time
- Object to processing in certain cases

Requests can be sent to: innerwellbeingcoach@gmail.com

10. Complaints

If you have a concern about how your data is processed, please contact us first.

You also have the right to lodge a complaint with the Dutch Data Protection Authority:

Autoriteit Persoonsgegevens
www.autoriteitpersoonsgegevens.nl

11. Changes to this policy

This privacy policy may be updated from time to time.

The most recent version will always be available on our website.