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# Privacy Policy

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**Effective date: 6. May 2025**

At Lighthouse Partnering GmbH, we take the respectful and careful handling of your personal data very seriously. This privacy policy provides an overview of how we collect, process, store and protect your personal data in accordance with the Swiss Federal Act on Data Protection (revDSG) and the European General Data Protection Regulation (GDPR).

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## 1 Controller

**Lighthouse Partnering GmbH**  
Heusser-Staub-Strasse 30  
8610 Uster, Switzerland  
Email: john.koch@lhpertnering.com

## 2 What Data We Collect

Depending on the type of service or your use of our website, we collect the following personal data:

- Identification and contact data: full name, email address, mobile number, postal address, date of birth, marital status, professional role
- Contextual data: agreements, logbooks, assessments, session notes, reflections
- Health data: only with explicit consent and where relevant
- Technical data: IP address, browser data, cookies, visit duration, location

## 3 How We Collect Data

We obtain your personal data:

- Directly from you (contacting us, booking an appointment, entering into a contract)
- Through use of our website (e.g. cookies, analytics tools)
- In the context of cooperation with third parties (e.g. sponsors, professionals)
- In coaching, supervision or training processes
- In individual cases, from third parties (e.g. sponsors, referees or training providers), where required to fulfil a contract or ensure quality

## 4 How We Use Your Data

We process your data for the following purposes:

- To fulfil our contractual obligations
- To manage coaching, supervision, or training processes
- For quality assurance, supervision, and professional accreditation (e.g. ICF, EMCC)<sup>1</sup>
- For administrative purposes such as invoicing

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<sup>1</sup> ICF: International Coaching Federation, EMCC: European Mentoring and Coaching Council.



- For communication and marketing, where you have given your consent
- To analyse and improve our website, using anonymised or pseudonymised data

## 4.1 Upholding of Professional Standards

As part of our ethical obligations and our commitment to the highest professional standards, we may process your data in the following ways:

- **Supervision, mentor coaching, or training:** We may share anonymised or hypothetical session content with professional peers, supervisors, mentors, or in training contexts for reflective practice or learning purposes.
- **Personal logbook:** We maintain a logbook containing your name, email address, recorded hours, and the duration of our engagement.
- **Official documentation:** This logbook may be shared with professional bodies or training institutions (e.g. ICF, EMCC) for certification or accreditation purposes.

These processing activities are based on our legitimate interests (Art. 6(1)(f) GDPR) and our professional obligations to recognised coaching and supervision organisations. Where required, we will request your explicit consent in advance.

## 4.2 Disclosing Data as Legally or Ethically Required

Where disclosure of data is legally or ethically required or appropriate, LHP retains the right to exercise discretion in disclosing relevant information to appropriate bodies or authorities, as required by law or ethical guidelines.

# 5 Legal Basis for Data Processing

We process personal data in accordance with applicable law and on the following basis:

- Your explicit consent (Art. 6(1)(a) GDPR / Art. 6 revDSG)
- To fulfil a contract or to take steps prior to entering into a contract (lit. b)
- To comply with legal obligations (lit. c)
- On the basis of legitimate interests, provided these do not override your interests (lit. f)
- To comply with professional standards (e.g. ICF, EMCC)

# 6 Data Sharing with Third Parties

We only share your data:

- With your explicit consent
- Where the sharing is necessary to fulfil a contract (e.g. with third-party providers for assessments)



- Where we are legally required to do so
- Where necessary for supervision or accreditation purposes (in anonymised or pseudonymised form)

International data transfers are only carried out with appropriate safeguards in place (e.g. Standard Contractual Clauses under the GDPR).

## 7 Data Retention Periods

We store personal data:

- Contracts and invoices: 10 years
- Personal logbook data: permanently, in line with the ethical standards set by professional bodies
- Audio recordings/transcripts:
  - Mentor coaching for ICF portfolio certification: until certification is granted
  - ICF portfolio evaluations: six months after the first ICF feedback submission
  - All other activities: until the end of the engagement
- Session notes and personal reflections: until the end of the engagement
- Technical data: in line with cookie lifespans or until deleted

Once the retention periods expire, the data will be securely destroyed or permanently deleted by the end of the following June.

## 8 Your Data Protection Rights

You have the following rights under the GDPR and revDSG:

- Right of access: request a copy of your personal data held by us
- Right to rectification: correct inaccurate or incomplete data
- Right to erasure: delete your data if it is no longer needed, if consent is withdrawn, or if no legal basis for retention exists
- Right to restriction of processing
- Right to data portability
- Right to object to processing
- Right to lodge a complaint

If you believe your personal data is being processed unlawfully, you have the right to lodge a complaint with a supervisory authority. As LHP is registered and operates under Swiss law, complaints should be directed to:



## **Federal Data Protection and Information Commissioner (FDPIC)**

Feldeggweg 1, 3003 Bern

<https://www.edoeb.admin.ch>

Phone: +41(0)31 322 43 95 (Mon-Fri, 10:00-12:00)

## **9 Data Security**

We protect your data using technical and organisational measures:

- SSL encryption on our website
- Access controls
- Confidentiality agreements with employees and partners
- Secure storage and protection against unauthorised access

## **10 Cookies and Web Analytics**

Our website uses cookies to improve usability and functionality. Most cookies are session cookies and are automatically deleted after your visit. We use:

- Essential cookies (for basic site functions)
- Analytics cookies (e.g. Matomo Cloud) on a pseudonymous basis

You can configure your browser to notify you about cookies, allow them only in specific cases, block them entirely, or automatically delete them when the browser is closed. Disabling cookies may restrict website functionality.

Cookies required for electronic communications or specific functions requested by you (e.g. shopping basket) are stored based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in storing cookies to provide an optimised and technically error-free service.

Non-essential cookies are only set with your explicit consent via our cookie banner. You may change your selection at any time.

Our website does not collect personal data from users in the United Kingdom or the United States for the purpose of personalised advertising. Third-party cookies are only set with explicit consent.

## **11 Notes for Data Subjects Outside Switzerland and the EU**

For data subjects in the United Kingdom, the provisions of the UK Data Protection Act and the UK GDPR also apply. Regardless of the chosen governing law in our general terms and conditions, your rights under applicable data protection law remain unaffected. Please contact us via the contact details above.



Residents of the United States, especially in California, may also contact us by email to request access, deletion, or restriction of their personal data. We do not sell or disclose personal data to third parties for advertising purposes without your explicit consent.

## 12 Changes to the Privacy Policy

This policy may be updated as needed. The most current version will be published on our website.

**Controller:**

John Koch  
Chief Executive Officer, Lighthouse Partnering GmbH  
john.koch@lhpartnering.com