

1. Purpose

This policy sets out how Liberta Coaching & Case Management LLC ensures compliance with data protection regulations applicable in the UAE (including DIFC Law No. 5/2020), the UK GDPR, EU GDPR, and other jurisdictions in which we operate.

2. Scope

This policy applies to all employees, contractors, and partners who process personal data on behalf of the company.

3. Roles and Responsibilities

Data Controller: Liberta Coaching & Case Management LLC

Data Protection Lead: Dr. Rebecca Apperson

All staff are responsible for data confidentiality and integrity.

4. Lawful Basis for Processing

We process personal data based on:

- Consent
- Contractual necessity
- Legal obligation
- Legitimate interest
- Vital interests (e.g., in emergencies)

5. Data Types and Collection

We collect and process:

- Client data (identification, contact, health or lifestyle information)
- Staff data (HR records, payroll, contracts)
- Website visitor data (analytics, cookies)

6. Data Protection Principles

We uphold the following principles:

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy

- Storage limitation
- Integrity and confidentiality
- Accountability

7. Security Measures

We implement:

- Password protection and encryption
- Access controls and role-based permissions
- Regular backups and secure servers
- Staff training on confidentiality and data handling

8. International Transfers

Transfers outside the UAE/UK/EU are conducted using:

- Standard Contractual Clauses (SCCs)
- DIFC Adequacy Guidelines
- Data Sharing Agreements

9. Subject Rights Requests

We have procedures in place to respond to:

- Access, rectification, and erasure requests
- Objections and restrictions
- Data portability and withdrawal of consent

10. Breach Management

Any data breach must be reported immediately to the Data Protection Lead. We have an internal incident response process and will notify regulators and affected individuals where required.

11. Retention and Disposal

Data is retained only as long as necessary for business, legal, or contractual purposes. Secure disposal includes digital wiping and physical shredding.

12. Training & Awareness

All staff are trained on this policy as part of onboarding and reviewed annually.

13. Policy Review

This policy is reviewed annually or upon major regulatory changes.