

MAPbyLiudmila Privacy Policy

Issued by Cocoon Factor Ltd, trading as MAPbyLiudmila

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1. Who Controls Your Personal Information

Cocoon Factor Ltd, trading as **MAPbyLiudmila**, is the data controller responsible for personal information processed in connection with MAPbyLiudmila.

I am **Liudmila Matei**, the sole shareholder and director of Cocoon Factor Ltd, and I am the person who manages personal information in connection with MAPbyLiudmila.

If you have a question about this Privacy Policy, the information I hold about you or your data-protection rights, please contact me at:

liudmila@mapbyliudmila.com

This Privacy Policy explains what personal information I collect, why I need it, how I use it, which third-party services may process it, how long I keep it and the rights available to you.

2. What Personal Information I Collect

The information I collect depends on how you interact with MAPbyLiudmila and which service you use.

Contact, Booking and Billing Information

When you enquire about, book or purchase a MAPbyLiudmila service, I may collect:

- your full name
- email address
- telephone number
- billing address
- country
- date of birth where required for the service
- details of the service you have booked or purchased
- appointment dates and times
- invoice, transaction and payment information

I use this information to communicate with you, manage your booking, provide the service, issue invoices, administer payments and maintain appropriate business, accounting and legal records.

Onboarding and Client Information

Before beginning certain MAPbyLiudmila services, I ask you to provide information that helps me understand you, your circumstances, what you would like to work with and what may be relevant to our work together.

Depending on the service, this may include:

- what has brought you to coaching
- areas in which you feel stuck or experience recurring difficulties
- relevant personal history
- relationship or family circumstances
- work or professional circumstances
- emotional experiences
- physical or health-related information you choose to disclose
- beliefs, values, religious or spiritual perspectives you choose to discuss
- goals, concerns and expectations
- information relevant to your ability to participate safely
- other information you consider relevant to the work

I use this information to prepare for our work together and to provide coaching that is relevant to your circumstances.

Emergency Contact Information

As part of onboarding for certain services, I may ask you to provide:

- the name of an emergency contact
- their relationship to you
- their telephone number and/or email address

I receive this information from you rather than directly from the emergency contact.

I keep it so that I have an appropriate person to contact where there is a serious situation concerning your safety or wellbeing and contacting them is reasonably necessary.

I do not use emergency-contact information for marketing or unrelated business purposes.

You should let the person know that you have provided their details to MAPbyLiudmila for this purpose and direct them to this Privacy Policy.

Coaching and Session Information

During the coaching relationship, I may also hold:

- information you share during sessions
- handwritten coaching notes

- electronic coaching notes and working files
- Zoom-generated transcripts
- Zoom AI-assisted session notes or summaries
- recordings where applicable
- emails
- WhatsApp messages
- questions, reflections or information you send between sessions
- signed agreements and Service Appendices
- recording acknowledgements
- consent and permission records

Because coaching can involve personal matters, some of this information may be sensitive.

3. Information I Need in Order to Provide a Service

Some information is necessary for me to administer and provide the MAPbyLiudmila service you have booked or purchased.

For example, I may need your name, contact details, billing information, booking information, completed onboarding information and the agreements applicable to the service.

Where required information is not provided, I may be unable to accept or complete a booking, complete onboarding or provide the relevant service.

Other information is voluntary. You are not expected to disclose personal or sensitive information that is not relevant to the work.

4. Special Category Personal Data

The nature of coaching and experiential work means that you may choose to disclose information which UK data-protection law classifies as **special category personal data**.

This may include information concerning:

- physical or mental health
- racial or ethnic origin
- religious or philosophical beliefs
- political opinions
- trade-union membership
- genetic or biometric data where applicable
- sex life
- sexual orientation

Such information may appear in onboarding information, conversations during sessions, handwritten or electronic notes, transcripts, AI-generated notes, messages or recordings.

Special category personal data receives additional legal protection.

Where I process it, I will do so only where an appropriate lawful basis under UK data-protection law and an applicable additional condition for processing special category data are in place.

Where I rely on **explicit consent**, that consent will be specific and expressly given rather than assumed.

I aim to collect and retain only personal and sensitive information reasonably relevant to the purposes for which it is being used.

5. Why I Am Allowed to Use Your Information

UK data-protection law requires me to have a valid legal reason for processing personal information.

The principal bases relevant to MAPbyLiudmila are:

Providing the Service You Have Chosen — Contractual Necessity

I need certain information in order to onboard you, administer and provide the MAPbyLiudmila service you have booked or purchased, arrange and manage sessions, communicate with you, process payment and administer the documents governing that service.

These may include the:

- **MAPbyLiudmila Terms & Conditions**
- **MAPbyLiudmila Coaching Agreement**
- relevant **MAPbyLiudmila Service Appendix**

Legal Obligations

I may need to process or retain certain information in order to comply with accounting, tax, legal or regulatory obligations.

Legitimate Interests

I may process information where this is reasonably necessary to operate and protect MAPbyLiudmila, maintain appropriate business and client records, manage enquiries and communications, administer the client relationship, respond to complaints or disputes, improve services or establish, exercise or defend legal rights.

Where I rely on legitimate interests, I consider whether those interests are outweighed by your rights and interests.

Consent

I may rely on your consent where you have a genuine choice about a particular use of your information.

Examples may include certain marketing communications, testimonial or promotional uses and particular recordings or other uses where consent is the appropriate legal basis.

Where processing relies on consent, you may withdraw that consent for future processing.

6. Coaching Notes and Working Records

I may take notes during or after coaching sessions in order to support continuity in the coaching relationship and follow the Client's journey over time.

These notes may be:

- handwritten on paper
- typed into my own electronic notes
- stored in electronic files
- created through the AI-assisted transcription and note-taking processes described elsewhere in this Privacy Policy

My notes may include themes, observations, progression, matters I want to revisit and, where useful, **the Client's exact words or quotations from the session.**

I may use these notes to:

- remember relevant themes and information
- review progression between sessions
- recognise recurring patterns or changes
- prepare for subsequent sessions
- record matters I may wish to revisit
- support continuity in the coaching relationship

I may refer back to these notes during later sessions and discuss observations, progression or recurring themes with you.

Handwritten notes are kept within my private office. Electronic notes and files are stored using the devices and systems I use for MAPbyLiudmila and are subject to reasonable technical and organisational safeguards.

I am the only person routinely handling these coaching records, although relevant third-party technology providers may process electronic information where necessary to provide the services described in this Privacy Policy.

I aim to record only information that I reasonably consider relevant to the coaching process and to retain it only for as long as there is a justified need to do so.

Use of Quotes and Client Insights in Public Content

From time to time, I may use a Client's words, reflections or insights to illustrate a broader idea in educational, reflective or public-facing content, including website material, newsletters, presentations, workshops or social-media posts.

Where an **identifiable quotation or identifiable Client material** is used, I will do so only where the Client has given the appropriate permission, including through the **MAPbyLiudmila Share Your Journey Consent Form** where applicable.

Where I use material **without separate Client permission**, I will only use it in a genuinely anonymised or sufficiently generalised form so that I do not reasonably believe the Client can be identified from the quotation, context or surrounding information.

The purpose of using such material is to illustrate a broader theme, principle or insight for a wider audience, not to disclose a Client's private coaching story.

7. Zoom AI-Assisted Note-Taking and Session Transcripts

I use **Zoom's AI-assisted transcription and note-taking functionality**, including Zoom AI Companion and Zoom meeting transcript features, during coaching sessions.

This may operate even where the session is not otherwise being recorded as a conventional audio or video recording.

The technology may process session audio in order to generate:

- a written transcript
- session notes
- summaries
- themes
- action points
- other documentation generated from the session conversation

Because coaching conversations may involve personal and sensitive subjects, transcripts and AI-generated notes may contain personal information and special category personal data.

I use these transcripts and AI-assisted notes to support continuity in the coaching relationship, review matters discussed, follow your journey and progression, prepare for subsequent sessions and maintain appropriate records of the work.

AI-generated notes, transcripts and summaries are used as **support tools only**. They do not replace my judgement and are not used to make solely automated decisions about you.

Zoom may process information through its own systems and may use third-party AI providers to provide some AI functionality. The applicable processing is subject to Zoom's privacy and service arrangements.

I do not treat Zoom transcription or AI-assisted note-taking as permission to publish, market or publicly share your private coaching material.

Any separate use of identifiable material is governed by the relevant recording arrangements, Service Appendix, Share Your Journey Consent process and applicable data-protection law.

8. ChatGPT Plus and Other AI-Assisted Business Support

I use **ChatGPT Plus, provided by OpenAI**, to support parts of my business and professional work.

This may include helping me:

- organise or summarise information
- identify broader themes
- analyse material
- structure reflections
- draft written material
- develop educational content
- support business administration

Where relevant to this work, information provided to ChatGPT may include extracts from Client communications, session-related material, transcripts, emails or WhatsApp messages.

I aim to minimise the personal information shared with ChatGPT and, where reasonably practical, remove or generalise identifying details before providing material to the service.

Depending on what a Client has chosen to discuss or communicate, material processed through ChatGPT may include personal information and special category personal data.

I use a personal **ChatGPT Plus** account with OpenAI's "**Improve the model for everyone**" setting **switched off**. This means that new conversations on that account are not used to train OpenAI's models, subject to OpenAI's applicable service, privacy, safety and retention arrangements.

ChatGPT is used as a support tool only. It does not replace my judgement and is not used to make solely automated decisions about Clients or Participants.

9. Private Session Recordings

Private 1:1 MAPbyLiudmila sessions are **not routinely audio- or video-recorded**.

This is separate from the Zoom AI-assisted transcription and note-taking described above.

Where I consider it useful to record a particular part of a private session, I will tell you before the recording begins and ask for your permission.

Where practicable, your permission will be captured within the recording itself so that there is a record of the agreement given.

If you do not agree, the session will continue without that recording.

A private recording made for coaching purposes does not automatically give me permission to use it as a testimonial or for marketing, promotion or public content.

Any materially different use requires the appropriate separate permission or other lawful basis.

10. Group Sessions, Recordings and Transcripts

Certain MAPbyLiudmila group programmes, workshops, intensives, retreats or other group experiences may involve:

- audio recording
- video recording
- transcription
- AI-assisted note-taking

Participants will be informed in advance of the arrangements applying to the relevant group service.

The applicable conditions are set out in the **MAPbyLiudmila Terms & Conditions** and relevant **Service Appendix** or recording acknowledgement.

Where a recorded group experience permits future audio use, a Participant who chooses to speak will have their voice captured.

Subject to the applicable Terms & Conditions, Service Appendix and data-protection requirements, group audio may be retained and may be used in whole or edited form in future Pre-Recorded MAPbyLiudmila Experiences, educational resources or other MAPbyLiudmila content.

Participant video images will not be used in future pre-recorded MAPbyLiudmila products without separate permission.

11. De-Identified Themes, Patterns and Insights

Through my work with Clients, I may notice recurring themes, questions, patterns or broader insights.

I may use those broader observations to inform educational or reflective material such as:

- website content
- articles
- newsletters
- social-media reflections
- presentations
- workshops
- other educational material

Where I do this without obtaining separate permission from a particular Client, the material is used in a **generalised and de-identified form**.

I do not include the Client's name or identifying details, and I do not present the material in a way that I reasonably believe would identify the individual Client.

This may include transforming a Client-specific experience or insight into a broader principle, question or reflection without disclosing the person or their private circumstances.

Identifiable testimonials, case studies, quotations, messages or stories are treated separately.

12. Share Your Journey Consent

If you choose to complete the **MAPbyLiudmila Share Your Journey Consent Form**, I may use only the material and identification permissions that you have actively authorised.

Depending on the choices you make, this may include:

- testimonials
- quotations
- written communications
- WhatsApp messages or emails
- photographs
- audio
- video
- personal stories
- your first name
- your full name
- your country
- other expressly authorised identifying information

Share Your Journey consent is voluntary and is separate from the information necessary to provide your coaching service.

Refusing to give this consent does not affect your coaching relationship or access to MAPbyLiudmila services.

13. Email, WhatsApp and Other Communications

I may communicate with you through email, WhatsApp or another communication channel agreed for the relevant service.

Those communications may contain information that you voluntarily share about your coaching experience, circumstances, questions or reflections.

Where you participate in a WhatsApp community or group, information you post within that group may also be visible to other group members.

WhatsApp and other third-party communication providers process information through their own systems and under their own privacy arrangements.

14. Website, Wix, Bookings and Newsletter

The MAPbyLiudmila website is operated using **Wix**.

I may use Wix for functions including:

- website hosting
- enquiry and contact forms
- bookings
- appointment administration
- subscriber management
- newsletter and email marketing
- website analytics
- security
- other website functionality

Where you subscribe to the MAPbyLiudmila newsletter, I may process your name, email address and subscription preferences in order to send you newsletters and related communications.

You may unsubscribe from marketing communications at any time through the unsubscribe facility provided or by contacting me.

Unsubscribing from marketing does not prevent me from sending essential communications relating to a service you have booked or purchased.

15. Billing, Xero and Accounting

I use **Xero** for invoicing and accounting.

Information entered into or processed through Xero may include:

- your full name
- billing address
- email address
- telephone number where required
- invoice details
- service purchased
- amounts charged or paid
- transaction and payment information

I use this information to issue and administer invoices, track payments and maintain appropriate accounting and financial records.

Xero is a third-party service provider and processes information through its own systems and privacy arrangements.

16. Payments and Stripe

Card and other supported online payments may be processed through **Stripe**.

Where you pay through Stripe, you enter payment information into Stripe's payment system.

I do not need to receive or retain your complete payment-card details in order to administer that payment.

I may receive and retain information associated with the transaction, such as:

- your name
- billing information
- service purchased
- payment amount
- payment status
- invoice or receipt information
- transaction reference

Stripe processes payment information under its own privacy and security arrangements.

17. Zoom and Online Sessions

Live online MAPbyLiudmila services may be delivered through **Zoom** or another platform identified for the service.

The provider may process information necessary to operate the online session, including account, meeting, device and technical information.

Where recording, transcription or AI-assisted note-taking applies, the relevant provisions of this Privacy Policy and the applicable service documents also apply.

18. Wix Bookings, Google Calendar and Google Services

I may use **Wix Bookings, Google Calendar and related Google services** to manage availability, appointments and session invitations.

Information processed for these purposes may include:

- your name
- email address
- service booked
- appointment date and time
- information reasonably necessary to administer the booking

19. Agreements, Electronic Signatures and Consent Records

I may use electronic systems to issue and obtain signatures or acknowledgements for documents including:

- MAPbyLiudmila Terms & Conditions
- MAPbyLiudmila Coaching Agreement
- Service Appendices
- onboarding documents
- recording acknowledgements
- Share Your Journey Consent Forms
- other relevant permissions or agreements

I may retain these records in order to demonstrate the terms agreed, administer the service, maintain a record of permissions and deal with complaints, disputes or legal matters where necessary.

20. Who I Share Personal Information With

I do not sell your personal information.

Where reasonably necessary to operate MAPbyLiudmila, information may be processed by or shared with providers including:

- **Wix** — website, forms, bookings and newsletter functionality
- **Xero** — invoicing and accounting
- **Stripe** — payment processing
- **Zoom** — online sessions, transcription and AI-assisted note-taking
- **Google** — calendar and related services
- **WhatsApp / Meta** — communications and communities where used
- **OpenAI / ChatGPT Plus** — where I use AI to support summarisation, organisation, analysis, drafting or development of business, educational or reflective material
- electronic-signature providers where used
- accountants, legal advisers or other professional advisers where necessary
- technical or administrative providers where reasonably required

I may also disclose personal information where:

- disclosure is required by law
- it is necessary to establish, exercise or defend legal rights
- disclosure is required for accounting, tax or regulatory purposes
- I reasonably believe there is a serious risk of harm to you, another person, a child, an animal, another living being, or the natural environment or ecosystem
- another lawful safeguarding obligation applies

Where appropriate and reasonably practicable, I will endeavour to discuss a serious-risk disclosure with you beforehand.

21. International Data Transfers

Some of the technology providers I use may process or store information outside the United Kingdom.

Where personal information is transferred internationally and UK data-protection law treats the transfer as restricted, the transfer must be covered by an appropriate legal mechanism.

This may include an applicable UK adequacy regulation, contractual safeguards or another lawful transfer mechanism.

You may contact me at liudmila@mapbyliudmila.com for further information about safeguards applying to a particular provider or transfer.

22. How Long I Keep Your Information

I do not keep all personal information for the same length of time.

I retain information only for as long as I can reasonably justify needing it for the purpose for which it is held.

Relevant considerations may include:

- whether you are currently working with me
- maintaining continuity during an ongoing programme
- the type and sensitivity of the information
- whether I need a record of an agreement, consent or permission
- accounting and tax requirements
- dealing with complaints or disputes
- establishing, exercising or defending legal rights
- other applicable legal requirements

When information is no longer reasonably required, I will delete, securely destroy or anonymise it as appropriate.

23. Security

I take reasonable technical and organisational measures appropriate to the nature and sensitivity of the information I hold.

I am the only person routinely operating MAPbyLiudmila and handling private Client coaching records on behalf of Cocoon Factor Ltd.

Handwritten coaching notes are kept within my private office.

Electronic notes and files are stored using the devices and services I use for MAPbyLiudmila and are subject to reasonable security measures.

Electronic information may also be processed through the third-party systems described in this Privacy Policy.

No method of electronic transmission or storage can be guaranteed to be completely secure, but I take reasonable precautions to protect personal information against unauthorised access, accidental loss, misuse, unlawful disclosure, alteration or destruction.

24. Your Data-Protection Rights

Depending on the circumstances and the lawful basis applying to the processing, you may have the right to:

- be informed about how your information is used
- request access to the personal information I hold about you
- request correction of inaccurate personal information
- request completion of incomplete information
- request deletion in certain circumstances
- request restriction of processing in certain circumstances
- object to certain processing
- receive certain personal information in a portable format where the right to data portability applies
- withdraw consent where processing relies on consent
- object to direct marketing

Not every right applies in every circumstance.

To exercise a right, contact:

liudmila@mapbyliudmila.com

Your Right to Object

Where I process your information on the basis of legitimate interests, you may have the right to object to that processing.

You also have the right to object to direct marketing.

25. Automated Decision-Making

I do not use personal information to make solely automated decisions about Clients or Participants that produce legal or similarly significant effects.

This includes information processed through Zoom AI-assisted transcription or ChatGPT Plus.

AI-generated outputs are used to support my work rather than to make decisions about you.

26. Cookies and Similar Technologies

The MAPbyLiudmila website may use cookies and similar technologies.

Information about the cookies used, their purposes and the choices available to visitors is provided separately through the **MAPbyLiudmila Cookie Policy** and the website's **Cookie Settings** facility.

Where consent is required for non-essential cookies, those cookies will be managed through the website's consent mechanism.

27. Changes to This Privacy Policy

I may update this Privacy Policy to reflect changes in MAPbyLiudmila services, technology providers, business practices or applicable legal and regulatory requirements.

The current version will be available at any time in the **Legal** section of the MAPbyLiudmila website.

Where a change materially affects the way I use personal information already held, I will provide further information where required before beginning the new processing.

28. How to Contact Me

For questions about this Privacy Policy, the information I hold about you or your data-protection rights, please contact:

Liudmila Matei

Sole shareholder and director

Cocoon Factor Ltd, trading as MAPbyLiudmila

Email: liudmila@mapbyliudmila.com

The MAPbyLiudmila Privacy Policy is available at any time in the **Legal** section of the MAPbyLiudmila website and may also be requested directly from me.

29. Complaints

If you have concerns about the way I have used or protected your personal information, please contact me first at:

liudmila@mapbyliudmila.com

You also have the right to complain to the **Information Commissioner's Office (ICO)**, the UK supervisory authority for data protection.