



PRIVACY POLICY

Synergy Center for the Neuroscience of Coaching & Leadership

Effective Date: May 9, 2026

Website: synergycentercoaching.com

Contact: csadira@synergycentercoaching.com

1. Introduction

Synergy Center for the Neuroscience of Coaching & Leadership is committed to protecting the personal data of all individuals who enroll in our coaching training programs. This Privacy Policy explains what personal data we collect, why we collect it, how we use it, and your rights under the General Data Protection Regulation (GDPR) (EU) 2016/679 and the UK GDPR, where applicable, as well as applicable US privacy laws.

Please read this policy carefully before registering for our programs. By enrolling, you confirm that you have read and understood this policy.

2. Who We Are (Data Controller)

Synergy Center for the Neuroscience of Coaching & Leadership Email:

csadira@synergycentercoaching.com Website: <https://synergycentercoaching.com/> If you have questions about how we handle your data, please contact us at the address above.

3. Personal Data We Collect

When you register for or participate in our programs, we may collect the following categories of personal data:

3.1 Identity and Contact Information

- Full name
- Email address
- Phone number
- Mailing address

3.2 Payment Information

- Payment card details or billing information
- Transaction records and purchase history

3.3 Program Participation Data

- Video and/or audio recordings of live program sessions in which you participate Mentor coaching session recordings (sessions may be recorded for quality assurance, ICF accreditation compliance, and educational assessment purposes; participants will be informed when a session is being recorded)
- Performance evaluation recordings and assessments

- Practice coaching recordings
- Assignment submissions and feedback
- Attendance records
- Any content you share on screen or verbally during sessions

3.4 Accommodations Information

- Information provided through the Program Support Request Form for documented disability or health related accommodations (processed confidentially and retained only as necessary).
- We do not collect special categories of personal data (such as health data, ethnicity, or political opinions) as part of our standard registration or program delivery process, except where you voluntarily provide accommodation related information for reasonable adjustments.

4. Legal Basis for Processing

We process your personal data on the following legal bases under Article 6 of the GDPR:

- Contract performance (Art. 6(1)(b)): Processing your name, email, payment information, and program participation data is necessary to deliver the coaching training program you have purchased and to manage your enrollment.
- Legitimate interests (Art. 6(1)(f)): We may record sessions for quality assurance, educational assessment, ICF accreditation compliance, safeguarding, and dispute resolution purposes, where our legitimate interests are not overridden by your rights.
- Legal obligation (Art. 6(1)(c)): We retain transaction records to comply with tax and accounting obligations, and maintain program records to meet ICF accreditation requirements.
- Consent (Art. 6(1)(a)): Where we use recordings for any purpose beyond those stated above (e.g., promotional content, testimonials), we will seek your explicit prior consent.
- For special category data related to accommodations, we process this under Article 9(2)(b) (employment, social security, and social protection law) and Article 9(2)(h) (health or social care purposes) where applicable.

5. How We Use Your Personal Data

We use your personal data for the following purposes:

- To process your enrollment and payment
- To provide access to and deliver live program sessions
- To coordinate mentor coaching sessions (for ICF credentialing pathway participants) To conduct performance evaluations and provide feedback
- To send you booking confirmations, session reminders, and administrative communications
- To record sessions for internal quality review, educational assessment, ICF accreditation compliance, and safeguarding purposes
- To maintain attendance and completion records required for program credentials and ICF documentation
- To process reasonable accommodation requests
- To respond to queries, complaints, or requests you raise with us
- To comply with applicable legal, regulatory, and ICF accreditation obligations To let you know about similar coaching programs and educational offerings we think you may enjoy, based on your participation in our programs (see Section 14 below). You can opt out of these communications at any time.

We will not use your personal data for automated decision making or profiling that produces legal or

similarly significant effects.

6. Sharing Your Data with Third Parties

We share your personal data only with the following categories of recipients:

- Payment processors (including PayPal, Stripe, and Klarna) to facilitate secure payment transactions. Your payment details are transmitted directly to and processed by our payment partners; we do not store full card details on our own systems.
- ICF (International Coaching Federation) where you are pursuing ICF credentialing and we are required to provide documentation of your program completion, attendance records, or performance evaluation results.
- Third party service providers who assist us in delivering our programs, including video conferencing platforms, scheduling tools, and participant portal software. These providers act as data processors and are contractually bound to process your data only as instructed and in compliance with applicable data protection law.

We do not sell, rent, or share your personal data with any other third party for their own marketing purposes. We will only disclose your data to other parties where required by law or with your explicit consent.

7. International Data Transfers

If our payment processors (PayPal, Stripe, Klarna) or program platforms transfer personal data outside the European Economic Area (EEA) or the UK, such transfers are safeguarded by appropriate mechanisms, including Standard Contractual Clauses (SCCs) approved by the European Commission or an adequacy decision. You may request information about the specific safeguards in place by contacting us.

8. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes described in this policy or as required by law:

Data Type	Retention Period
Name, email, and contact information	Duration of enrollment plus up to 3 years for administrative, accreditation, and legal purposes
Payment records	7 years to comply with tax and financial regulations
Program participation records (attendance, assignments, performance evaluations)	Minimum of 3 years to comply with ICF accreditation requirements

Session recordings Up to 3 years following the relevant session for educational assessment and accreditation purposes, unless a longer period is required for legal or safeguarding reasons, or unless you have provided consent for longer term use

Data Type	Retention Period
Observed session class recordings.	One month following the end of the progra
Mentor coaching and performance evaluation recordings.	Up to 3 years for ICF documentation and quality assurance purposes

When your data is no longer needed, we will securely delete or anonymize it.

9. Your Rights Under the GDPR

As a data subject in the European Union or United Kingdom, you have the following rights in relation to your personal data:

- Right of access: You may request a copy of the personal data we hold about you. Right to rectification: You may ask us to correct inaccurate or incomplete data. Right to erasure (right to be forgotten): You may request deletion of your data where there is no longer a lawful basis for us to hold it.
- Right to restriction of processing: You may ask us to limit how we use your data in certain circumstances.
- Right to data portability: You may request your data in a structured, commonly used, machine readable format.
- Right to object: You may object to processing based on legitimate interests. Right to withdraw consent: Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us at csadira@synergycentercoaching.com. We will respond within one calendar month. You will not be charged for making a request.

If you are not satisfied with our response, you have the right to lodge a complaint with your national supervisory authority. If you are based in the EU, your relevant authority is the Data Protection Authority in your country of residence. If you are based in the UK, the relevant authority is the Information Commissioner's Office (ICO): www.ico.org.uk.

10. US Privacy Rights

If you are a resident of California or another US state with applicable privacy rights, you may have additional rights regarding your personal data under laws such as the California Consumer Privacy Act

(CCPA) and California Privacy Rights Act (CPRA), as well as similar laws in Virginia, Colorado, Connecticut, and other states.

These rights may include:

- Right to know: You may request information about the categories and specific pieces of personal data we have collected about you.
- Right to delete: You may request that we delete personal data we have collected from you, subject to certain exceptions.
- Right to correct: You may request that we correct inaccurate personal data we hold about you.
- Right to opt out of sale: We do not sell your personal data to third parties. Right to nondiscrimination: We will not discriminate against you for exercising any of your privacy rights.

To exercise any of these rights, please contact us at csadira@synergycentercoaching.com. We will respond within the timeframe required by applicable law (45 days for most US state laws, with a possible extension of an additional 45 days where necessary).

11. Cookies and Tracking Technologies

Our website and program platforms use cookies and similar technologies. We use the following categories of cookies:

- Essential / Functional cookies: Required for the site and program platform to operate. These maintain your session, remember your login, and enable core functionality. These cookies are always active and cannot be disabled.
- Analytics cookies: Used to understand how visitors interact with our website (for example, via Google Analytics). These cookies collect anonymized data about site usage and help us improve our services. Your consent is required before these cookies are set if you are visiting from the EU or UK.
- Marketing / Advertising cookies: Used to track activity across websites for advertising purposes (for example, Meta Pixel for Facebook or Instagram advertising). Your consent is required before these cookies are set if you are visiting from the EU or UK.

Where required by law, we will present a cookie consent banner that allows you to accept or decline nonessential cookies. You can update your cookie preferences at any time through the cookie settings on our website.

12. Data Security

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, accidental loss, destruction, or disclosure. These include:

- Encrypted transmission of payment data via our payment processors.
- Access controls limiting who within our organization can access personal data.
- Secure storage of session recordings and program records with restricted access.
- Access controlled systems for participant data storage

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the relevant supervisory authority within 72 hours and, where required, inform you directly without undue delay.

13. Children's Data

Our programs are not directed at children under the age of 16. We do not knowingly collect personal data from anyone under 16 without verifiable parental or guardian consent. If you believe a child under 16 has registered without appropriate consent, please contact us immediately so we can take appropriate action.

14. Marketing Communications About Similar Programs

As an existing participant who has enrolled in one of our coaching training programs, we may contact you by email to let you know about similar programs and educational offerings that we believe may be of interest to you. We do this on the basis of our legitimate interests in keeping our existing participants informed about relevant programs.

We will only contact you about offerings that are closely related to the program you have already participated in. We will never pass your details to third parties for their own marketing purposes.

You can opt out of these communications at any time by clicking the unsubscribe link included in every email we send, or by contacting us directly at csadira@synergycentercoaching.com. Once you opt out, we will not contact you again for these purposes. Opting out of marketing communications does not affect enrollment related or program essential communications.

Note for EU participants: The rules on direct marketing vary across EU member states. Where your country of residence requires explicit consent for such communications, we will obtain your consent before sending them. If you are unsure of your rights in your country, we recommend consulting your national data protection authority.

15. Non Discrimination and Inclusive Learning Environment

Synergy Center provides an inclusive learning environment and does not discriminate on the basis of race, ethnicity, national origin, gender identity or expression, sexual orientation, age, religion, disability, socioeconomic status, or other protected characteristics. We are committed to protecting the privacy and dignity of all participants.

16. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. The updated policy will be posted on our website with a revised effective date. Where changes are material, we will notify registered participants by email. We encourage you to review this policy periodically.

17. Contact Us

If you have any questions, concerns, or requests relating to this Privacy Policy or our data practices, please contact us at:

Synergy Center for the Neuroscience of Coaching & Leadership Email:
csadira@synergycentercoaching.com Website: <https://synergycentercoaching.com/>

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