

NATURAL WISDOM

Equine Assisted Therapy & Horse-Led Coaching

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Data Protection & Privacy Policy

Last updated: 2 April 2026

Natural Wisdom is committed to protecting your privacy and handling your personal information responsibly, transparently, and securely. This Privacy Policy explains how we collect, use, store, and protect your personal data when you engage with our services, visit our website, or communicate with us.

We comply with:

- The UK General Data Protection Regulation (UK GDPR)
- The UK Data Protection Act 2018
- The Texas Data Privacy and Security Act (TDPSA), effective July 2024
- Applicable US privacy laws, including the California Consumer Privacy Act (CCPA) as amended by the CPRA, where relevant

1. Who We Are

Natural Wisdom provides a range of horse-led therapeutic and coaching services. Please note that services are available in different locations depending on the type of work:

- Equine Assisted Therapy — available in the UK only (Lancashire and Cheshire)
- Equus Coaching — available in both the UK and the USA (Texas Hill Country, near Austin)
- Horse-led personal and professional development workshops — available in both the UK and the USA
- Leadership development experiences — available in both the UK and the USA
- Online coaching and psychotherapy — available to clients in the UK, USA, and internationally

We are based in the United Kingdom, with in-person services also operating in the Texas Hill Country, near Austin, USA. We work with clients in the UK, the United States (including Texas and California), and internationally.

Data Controller

Jackie Archer

Natural Wisdom

jackie@naturalwisdom.horse

www.naturalwisdom.horse

ICO Registration Reference: ZB868080

Registered with the UK Information Commissioner's Office (ICO)

2. What Personal Data We Collect

We may collect and process the following categories of personal data:

Identity & Contact Information

- Name
- Email address
- Phone number
- Location (city, state, or country)

Service & Booking Information

- Session, workshop, or retreat bookings
- Attendance records
- Intake or pre-work form responses
- Preferences related to participation

Health or Background Information (Limited & Optional)

Information you voluntarily choose to share that is relevant to your therapeutic or coaching goals, or to your safe participation in a session. This information is provided with your explicit consent and is treated with the highest level of confidentiality in accordance with our professional and ethical obligations.

Payment Information

Invoicing and transaction details. We do not store full card or banking information. Payments are processed securely via third-party providers such as Stripe or PayPal.

Website & Technical Data

- IP address
- Browser type
- Pages visited
- Date and time of visits

This data is collected for website analytics and service improvement purposes only.

We do not knowingly collect personal data from children under the age of 13 without appropriate parental or guardian consent.

3. How We Use Your Personal Data

We use your personal data to:

- Deliver coaching sessions, therapy, workshops, and retreats
- Communicate with you about bookings, sessions, and services
- Manage scheduling and attendance
- Provide client support and follow-up
- Meet legal, tax, and regulatory obligations
- Improve our website, services, and client experience

Marketing communications are sent only where you have opted in. You may withdraw consent and unsubscribe at any time by contacting jackie@naturalwisdom.horse.

4. Lawful Bases for Processing (UK GDPR)

We process personal data under one or more of the following lawful bases:

- Consent — where you have given clear, informed permission
- Contract — where processing is necessary to deliver services you have engaged
- Legal obligation — for compliance with legal, tax, and regulatory requirements
- Legitimate interest — for operating and improving our services, balanced against your rights and freedoms

5. Your Rights

Under UK GDPR

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (deletion) of your data
- Restrict or object to processing
- Request data portability
- Withdraw consent at any time, where consent is the lawful basis
- Lodge a complaint with the UK Information Commissioner's Office (ICO) at www.ico.org.uk

For Texas Residents (TDPSA)

If you are based in Texas, you have the right to:

- Know what personal data we collect about you and why
- Access, correct, or delete your personal data
- Obtain a portable copy of your data
- Opt out of any sale or sharing of your personal data (we do not sell personal data)
- Appeal any decision we make regarding your data rights

To exercise your rights, contact jackie@naturalwisdom.horse. We will respond within the timeframes required by applicable law.

For California Residents (CCPA/CPRA)

You also have the right to:

- Know what personal information we collect, use, and share
- Request deletion of your personal information
- Correct inaccurate personal information
- Opt out of the sale or sharing of personal data (we do not sell personal data)
- Limit the use of sensitive personal information
- Not be discriminated against for exercising your privacy rights

To exercise any California privacy rights, contact: jackie@naturalwisdom.horse

6. International Clients & Data Transfers

Natural Wisdom operates from the United Kingdom and delivers in-person services in both the UK and the United States (Texas Hill Country). As a result, your personal data may be collected, stored, and processed in either jurisdiction depending on where you engage with our services.

UK-Based Clients

Your data is processed in accordance with UK GDPR and the Data Protection Act 2018. Where third-party service providers are used outside the UK, appropriate safeguards are in place, including Standard Contractual Clauses or recognised international data transfer frameworks.

US-Based Clients (Texas & Beyond)

Clients engaging with Natural Wisdom's Texas Hill Country services or US-based online offerings should be aware that their data may be transferred to and processed in the United Kingdom, where it will be subject to UK data protection law. We apply equivalent standards of care regardless of where your data is processed.

We comply with the Texas Data Privacy and Security Act (TDPSA) for clients based in Texas, and with the CCPA/CPRA for clients based in California. Your rights under those laws are set out in Section 5 above.

Third-Party Providers

Where we use third-party platforms (such as scheduling tools, payment processors, or cloud-based systems), we ensure those providers maintain appropriate data protection standards. We do not transfer your data to any provider that does not offer adequate protections.

By engaging with Natural Wisdom's services — whether in the UK or the United States — you acknowledge that your personal data may be transferred between these jurisdictions and processed in accordance with this Privacy Policy.

7. Data Retention

We retain personal data only for as long as necessary to provide our services, meet our legal and professional obligations, and uphold our ethical standards. UK GDPR does not prescribe specific time limits — retention periods are set by us based on purpose, professional guidance from the BACP, and applicable legal timeframes. Clients are informed of retention periods at the point of engagement.

Workshops, Retreats & Group Experiences

We do not retain individual coaching or therapeutic notes for group sessions. We may retain attendance records, booking and payment information, and any pre-work or feedback forms submitted voluntarily for up to 6 years after the last engagement.

1:1 Coaching & Therapy Sessions — Adult Clients

For individual adult clients, we may retain the following for up to 6 years after the final session, in line with BACP ethical guidance and the timeframe within which a professional complaint could be raised:

- Attendance records and session notes
- Intake, assessment, and pre-work forms
- Written communications including emails
- Text messages and WhatsApp messages sent or received in a professional capacity
- Creative materials produced during sessions (see below)

1:1 Therapy Sessions — Children & Young People (Under 18)

For clients who are children or young people at the time of therapy, records are retained until the client reaches the age of 25. This is because individuals cannot bring a legal claim during childhood, meaning the limitation period begins only when they reach adulthood. This reflects BACP guidance and best practice for practitioners working with minors.

Records retained for children and young people include:

- Attendance records and session notes
- Assessment and intake forms
- Communications with parents, guardians, schools, or social care
- Emails, text messages, and WhatsApp messages sent or received in connection with the client
- Creative materials produced during sessions

Where a young person has Gillick competence and has consented to therapy independently, their records are treated with the same confidentiality afforded to adult clients. Access by parents or guardians is considered on a case-by-case basis in accordance with our safeguarding obligations and BACP guidance.

Emails, Texts & WhatsApp Messages

All electronic communications — including emails, SMS text messages, and WhatsApp messages — sent or received in connection with a client's therapy or coaching engagement are considered part of the client record. They are subject to the same retention periods as session notes and stored securely in accordance with this policy.

WhatsApp and similar messaging platforms are used for communication purposes only. Sensitive or clinical content is not shared via these channels where it can be avoided. Where a client contacts us via WhatsApp, relevant content may be saved to the client record.

Creative Materials Produced During Sessions

Artwork, written materials, worksheets, and other creative outputs produced by clients during therapy or coaching sessions may form part of the therapeutic record. In accordance with BACP guidance, if any such material could identify or be linked to a living individual, it is subject to data protection law.

Creative materials are stored securely with access restricted to Jackie Archer only. Physical materials are held in a locked, secure location. Digital materials are stored in an encrypted, password-protected system. Clients are informed at the point of engagement how their creative work will be stored and for how long.

Retention of creative materials follows the same periods as session notes — up to 6 years for adult clients, and until the age of 25 for clients who were minors at the time of the work.

Retention Summary

- Client contact details: 7 years after last engagement
- Session notes, attendance and intake forms (adults): 7 years after final session
- Session notes, attendance and intake forms (children/young people): until the client reaches age 25
- Emails, texts and WhatsApp messages: Relevant information is saved to client notes. All other electronic communications are deleted after 6 months.
- Creative materials produced in sessions: same period as session notes (see above)
- Financial and invoicing records: 7 years (statutory tax requirement)
- Marketing opt-ins: until consent is withdrawn

After the applicable retention period has lapsed, all data is deleted. This includes session notes, attendance records, intake forms, emails, text messages, WhatsApp messages, and any creative materials produced during sessions. Physical materials are shredded securely. Digital data is permanently deleted from all systems and devices. No personal data is retained beyond the periods set out above unless we are required to do so by law.

8. Data Security

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

- Secure, password-protected cloud-based systems
- Access controls restricted to authorised persons only
- Encrypted communications where appropriate
- Regular review of data handling practices

In the event of a data breach that is likely to affect your rights or freedoms, we will notify you and the relevant supervisory authority in accordance with our legal obligations.

9. Cookies & Website Analytics

Our website uses cookies and analytics tools (such as Google Analytics) to understand how visitors use our site and to improve user experience. Cookies may collect anonymised data including pages visited, time spent on the site, and general location data.

You can manage your cookie preferences at any time through your browser settings. Continued use of our website without changing your settings indicates acceptance of our cookie use.

10. Data Sharing

We do not sell, rent, trade, or otherwise share your personal data for commercial purposes.

Data may be shared only with:

- Secure payment and scheduling providers necessary to deliver our services
- Website analytics providers using anonymised, aggregated data only
- Legal or regulatory authorities where required by law
- Professional supervisors or insurers, in strictly limited and confidential circumstances

All third-party providers are subject to appropriate contractual data protection obligations.

11. External Links

Our website may contain links to external websites. Natural Wisdom is not responsible for the privacy practices or content of those sites. We encourage you to review their privacy policies separately before submitting any personal information.

12. Children & Young People

Where Natural Wisdom works with children or young people under the age of 18 (including through our Equine Assisted Therapy services), we collect and process data relating to those young people in accordance with our safeguarding obligations, parental or guardian consent requirements, and applicable data protection law.

We do not collect personal data from children under 13 through our website without explicit parental or guardian consent.

13. Policy Updates

This Privacy Policy may be updated periodically to reflect changes in law, regulation, or our operating practices. The most current version will always be available on our website at www.naturalwisdom.horse. Where changes are significant, we will take reasonable steps to notify existing clients.

14. Contact & Complaints

If you have any questions about this Privacy Policy, wish to exercise your data rights, or have a concern about how we have handled your personal information, please contact:

Jackie Archer — Data Controller

Natural Wisdom

jackie@naturalwisdom.horse

www.naturalwisdom.horse

ICO Registration Reference: ZB868080

If you are based in the UK and are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Telephone: 0303 123 1113

If you are based in Texas and wish to appeal a decision about your data rights, you may do so by contacting us in the first instance at jackie@naturalwisdom.horse. We will acknowledge and respond to appeals within the timeframes required under the TDPSA.