

Privacy policy

under EU Regulation 2016/679 (GDPR). Last updated: October 2026.

1. Data controller

The controller of the personal data collected through www.marcovalentinicoach.com and in the course of providing coaching, training and mentoring services is:

Marco Valentini, via Ippolito Pindemonte 8, 56017 San Giuliano Terme (PI), Italy. Email: marco@marcovalentinicoach.com

2. Data we collect

2.1 Browsing data

While you browse the site, technical data such as IP address, browser type, operating system, referring URL and date and time of access are collected automatically. These data are needed for the site to work and are not linked to identified people.

2.2 Data you provide

Through the forms on the site (contact, Saboteur Assessment request, guide downloads), the call booking page or other channels (email, LinkedIn, phone), you may share personal data such as your name, email address, phone number and any other information included in your message. When you book a paid session, the data needed for payment are also processed, handled directly by the payment provider (the controller does not receive or store full card details).

2.3 Data processed when providing coaching services

When providing professional services (individual and team coaching sessions, training programmes, mentoring), personal data about clients and, where relevant, third parties mentioned during sessions may be processed, including:

- identification and contact details
- professional information (role, organisation, workplace dynamics)
- content shared during sessions, including any sensitive information
- results of tests and assessments (for example the Positive Intelligence® Saboteur Assessment)
- notes and reflections prepared by the controller to support the professional work

2.4 Cookies and local storage

The site does not use profiling cookies or advertising trackers. To see, in anonymous and aggregate form, how many people visit the site, which pages they read and where they come from, the controller uses Cloudflare Web Analytics, which sets no cookies, collects no identifying data and does not follow users across sites. Your browser only stores, locally, the language you chose (English or Italian), so it can show it on your next visit. This is technical storage: it does not require consent and is not sent to the controller.

3. Digital and AI tools

In the course of his professional activity, the controller uses third-party digital tools that may process personal data on his behalf as data processors.

3.1 Website, bookings and communication

- **Cloudflare, Inc.:** anonymous, aggregate visit statistics (Cloudflare Web Analytics, cookie-free). Data may be transferred to the USA. Privacy policy: cloudflare.com/privacypolicy
- **Netlify, Inc.:** hosts the site. Browsing data may be transferred to the USA. Privacy policy: netlify.com/privacy
- **Coaching AI** (LeadConnector / HighLevel Inc. platform): manages the site forms, contacts, call bookings and emails, including guides and newsletters. Data may be transferred to the USA. Privacy policy: gohighlevel.com/privacy-policy
- **Stripe Payments Europe, Ltd.** (Ireland): online payments for booked sessions. Some data may be transferred to the USA. Privacy policy: stripe.com/privacy
- **Zoom Video Communications, Inc.:** remote sessions. Data may be transferred to the USA. Privacy policy: zoom.us/privacy
- **Google LLC** (Google Drive, Gmail): document storage and email. Data may be transferred to the USA. Privacy policy: policies.google.com/privacy

3.2 Programme tools

- **Positive Intelligence, Inc.:** platform and app for the PQ Programme and the Saboteur Assessment. To generate your personal assessment link, the controller registers your name and email address on the Positive Intelligence portal. Data may be transferred to the USA. Privacy policy: positiveintelligence.com/privacy-policy

3.3 AI tools

The controller uses artificial intelligence tools to support activities such as drafting content, processing professional notes and preparing training materials. The main tools are:

- **Claude (Anthropic PBC):** AI assistant for text processing and professional support. Data are processed on servers in the USA. Privacy policy: anthropic.com/legal/privacy
- **Other AI tools:** the controller may use further AI-based tools (for example dictation or language-processing tools). In these cases particular care is taken to minimise the data shared.

The controller's commitment. When using AI tools, the controller avoids sharing client-identifying data where it isn't necessary, and prefers anonymised or pseudonymised information. Data shared with AI tools are not used for purposes other than the professional ones described in this policy.

4. Purposes of processing

Personal data are processed in order to:

- reply to contact requests and questions

- send the guides and materials requested through the site
- register you on the Positive Intelligence portal to send you your Saboteur Assessment link
- send, with your consent, newsletters and content on leadership and performance
- manage call bookings and related payments
- provide the coaching, training and mentoring services requested
- manage the professional relationship with the client, including invoicing
- prepare notes and materials supporting the coaching work
- comply with legal obligations

5. Legal basis

- **Consent** (Art. 6(1)(a) GDPR): for data sent through the site forms, for registration to the Saboteur Assessment and for newsletters and marketing communications
- **Performance of a contract** (Art. 6(1)(b) GDPR): for processing needed to provide the professional services requested
- **Legitimate interest** (Art. 6(1)(f) GDPR): for administration and the improvement of the services offered
- **Legal obligation** (Art. 6(1)(c) GDPR): for tax and regulatory compliance

6. Transfers outside the EEA

Some of the tools used by the controller (including Netlify, Cloudflare, Coaching AI, Stripe, Zoom, Google, Positive Intelligence and Anthropic) process data on servers in the United States or in other countries outside the European Economic Area. These transfers take place under the safeguards provided by the GDPR, in particular the Standard Contractual Clauses adopted by the European Commission or other adequate transfer mechanisms. More information is available in each provider's privacy policy, listed in section 3.

7. How long data are kept

- **Contact form and booking data:** kept for as long as needed to reply to the request, then deleted, unless a professional relationship begins
- **Newsletter and guide download data:** kept until you unsubscribe or withdraw your consent
- **Data relating to professional relationships:** kept for the duration of the relationship and then for the periods required by applicable tax and civil law (generally 10 years)
- **Coaching notes:** kept for the duration of the programme and for a reasonable period afterwards, agreed with the client where possible

8. Data security

The controller takes appropriate technical and organisational measures to protect personal data from unauthorised access, disclosure, alteration or destruction. These include encrypted connections, restricted access to data and the choice of providers that guarantee adequate security standards.

9. Your rights

As a data subject, you have the right to:

- **Access** (Art. 15 GDPR): obtain confirmation of the processing and a copy of your data
- **Rectification** (Art. 16 GDPR): ask for inaccurate or incomplete data to be corrected
- **Erasure** (Art. 17 GDPR): ask for your data to be deleted in the cases provided by law
- **Restriction** (Art. 18 GDPR): ask for the processing to be restricted in certain circumstances
- **Portability** (Art. 20 GDPR): receive your data in a structured, machine-readable format
- **Objection** (Art. 21 GDPR): object to processing based on legitimate interest
- **Withdrawal of consent**: withdraw your consent at any time, without affecting the lawfulness of earlier processing. Every newsletter email includes a one-click unsubscribe link

To exercise these rights, write to marco@marcovalentinicoach.com. You also have the right to lodge a complaint with the competent supervisory authority (in Italy: Garante per la protezione dei dati personali, www.garanteprivacy.it).

10. Changes to this policy

The controller may update this policy to reflect changes in the law, in the organisation or in the digital tools used. The updated version will be published on the site with the date of the update. In case of substantial changes, clients with an ongoing professional relationship will be informed directly.