

# Reflective Rebels Privacy Notice

Last updated: 21 October 2026

## Who I am

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Reflective Rebels is the trading name of Adnovar Ltd, a company registered in England and Wales (company number 12902626). Our registered office is 128 City Road, London EC1V 2NX, and we're registered with the Information Commissioner's Office under reference ZB229661.

I'm Ben Hickman, and I run Reflective Rebels. That makes me responsible for looking after your personal information, which in legal terms means Adnovar Ltd is the "controller". This notice explains what I collect, why, what I do with it and how long I keep it, in plain English.

If you have any questions, or want to use any of your rights, email me at [ben@reflectiverebels.co.uk](mailto:ben@reflectiverebels.co.uk).

## What I collect and why

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I only collect what I need to work with you, run the business and stay in touch with people who want to hear from me.

**Coaching clients.** Your name, contact details, business name and address, what you've booked, your Letter of Agreement, payment and invoice details, appointment history, and the notes I take during our sessions. I use this to deliver your coaching, manage bookings, take payment and keep proper records.

**Badass Business Lab, Rebels Collective and event attendees.** Your name, contact details, booking and payment details, and any access or dietary needs you tell me about so I can look after you on the day. For some events I may ask for an emergency contact, purely in case something happens while you're with me.

**People I meet through networking.** If you hand me a business card, connect with me, or I find your professional details on LinkedIn or your company website, I'll keep your name, role, business and contact details so I can follow up on a conversation or a possible piece of work.

**Newsletter subscribers and enquiries.** Your name and email address, and what you've signed up for or asked about, so I can send you what you requested and reply to you.

**Website visitors.** My website is hosted by Wix, which collects technical information such as your IP address, browser and how you use the site. You can control non-essential cookies through the cookie banner.

**Testimonials, photos and video.** If you give me a testimonial, I'll use your words and, with your agreement, your name and business. Photos or video may be taken at events, sometimes by marketing partners who capture content for me. If you'd rather not appear, just tell me on the day or beforehand.

## Coaching notes and sensitive information

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Coaching conversations rarely stay purely about business. You might talk about your health, wellbeing, relationships or personal circumstances, and the law treats some of that as "special category" information that needs extra care.

I'll only record that kind of information with your explicit consent, which I ask for separately in your Letter of Agreement. I handwrite my notes on a reMarkable tablet, and they're used for one thing only: coaching you well. I don't share them with anyone, I never put them into AI tools, and you can withdraw your consent at any time, in which case I'll delete them.

If you tell me about access or dietary needs for an event, I'll use that only to look after you at that event and delete it afterwards.

## How I use AI

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I use AI tools, mainly Claude by Anthropic, to help with the admin side of the business: drafting Letters of Agreement, booking appointments, organising my diary and similar tasks. That can involve your name, contact details, business name and the service you've booked.

I don't put coaching notes, or anything personal you share in our sessions, into AI tools. I've switched off the settings that would let the AI provider use my conversations to train its models. AI never makes decisions about you; it helps me with paperwork, and every decision is mine.

## The legal bits: why I'm allowed to use your information

UK data protection law says I need a lawful reason for each thing I do with your information. Here's which one applies where.

| What I'm doing                                                                                 | Lawful basis                       |
|------------------------------------------------------------------------------------------------|------------------------------------|
| Delivering coaching, the Lab, events and anything else you've booked                           | Contract                           |
| Keeping financial records and invoices                                                         | Legal obligation                   |
| Following up with business contacts, running and improving the business, keeping things secure | Legitimate interests               |
| Holding an emergency contact for an event                                                      | Legitimate interests (your safety) |
| Sending my newsletter, publishing testimonials, photos and video                               | Consent                            |
| Recording sensitive information in coaching notes                                              | Explicit consent                   |

Where I rely on consent, you can withdraw it at any time. Where I rely on legitimate interests, I've weighed my interests against yours, and you can object at any time. If you ask me to stop contacting you, I will.

## Where I get your information from

Mostly from you: when you book, sign up, email, message me or hand me a business card. Sometimes I'll find professional contact details in public places such as LinkedIn or your company's website. If I contact you that way, I'll tell you where I found your details and point you to this notice, and you can ask me to delete them. I don't buy marketing lists.

## Who I share it with

I never sell your information. I use a small number of trusted services to run the business, and they handle your information on my behalf. The main ones are below. I may swap one for a similar service from time to time; when I do, it will be used in the same way and with the same protections.

| Service                  | What I use it for                                |
|--------------------------|--------------------------------------------------|
| Wix                      | Website, bookings, newsletter and event listings |
| Google                   | Email, calendar and documents                    |
| Dropbox and Dropbox Sign | Storing and signing agreements                   |
| QuickBooks               | Accounts and invoicing                           |
| GoCardless               | Taking payments                                  |
| reMarkable               | Storing and backing up my handwritten notes      |
| Anthropic (Claude)       | AI help with admin tasks                         |
| WhatsApp                 | Messaging, if you choose to contact me that way  |

I may also share information with my accountant and other professional advisers, marketing partners who capture content at my events, the emergency services if someone's safety is at risk, and anyone I'm legally required to share it with.

Some of these services are based in, or store data in, the United States or other countries outside the UK. Where that happens, the transfer is protected either by UK adequacy rules (including the UK-US Data Bridge) or by legally approved contract terms. If you'd like more detail, just ask.

## How long I keep it

I keep information only as long as I need it, then delete it.

| Information                                        | How long                                                       |
|----------------------------------------------------|----------------------------------------------------------------|
| Coaching notes                                     | 12 months after our coaching ends                              |
| Letters of Agreement and financial records         | 6 years after the end of the financial year they relate to     |
| Enquiries that don't lead to work                  | 12 months, unless you've joined my newsletter                  |
| Newsletter subscribers                             | Until you unsubscribe                                          |
| Event emergency contacts, access and dietary needs | Deleted shortly after the event                                |
| Business contacts from networking                  | Until they're no longer relevant, or you ask me to delete them |
| Testimonials, photos and video                     | Until you ask me to remove them                                |

Once something has been published or printed, I can't always pull back every copy, but I'll remove it from anything I control.

## Keeping it secure

Client records are kept on password-protected devices, and the services I use are secured and encrypted. I'm the only person with access to your coaching notes. If something ever went wrong and your information was put at risk, I'd tell you, and the ICO where the law requires it.

## Changes to this notice

I'll keep this notice up to date as the business and the tools I use change. If I make a change that affects how your information is used in a way you wouldn't expect, such as using it for a new purpose, I'll tell you directly before it happens and, where needed, ask for your consent. The date at the top shows when it was last updated.

If Reflective Rebels or Adnovar Ltd is ever sold, merged or restructured, your information may pass to the new owner, who will have to look after it in line with this notice.

## Your rights and how to complain

You have the right to ask for a copy of the information I hold about you, to have it corrected if it's wrong, and to have it deleted. You can also ask me to limit how I use it, object to me using it, or ask for it to be passed to you or someone else in a usable format. Some of these rights depend on the lawful basis I'm relying on, and there are a few legal exceptions, but I'll always explain if one applies.

To make a request, email [ben@reflectiverebels.co.uk](mailto:ben@reflectiverebels.co.uk). It's free, and I'll respond within one month.

If you're unhappy with how I've handled your information, please talk to me first and I'll do my best to put it right. You can also complain to the Information Commissioner's Office:

Information Commissioner's Office  
 Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF  
 Helpline: 0303 123 1113  
 Website: [ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint)