**Woodville Psychology Privacy Policy**

This privacy policy provides information about how we collect and process your personal data that we (Woodville Psychology) hold about you. This includes personal data you provide to us through your use of our site [www.woodvillepsychology.co.uk](http://www.woodvillepsychology.co.uk) and when you deal directly with us.

By providing us with data, you warrant to us that you are over 13 years of age.

**Dr Taryn Talbott** is the data controller and responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice). She is registered with the Information Commissioner’s Office (ICO; registration no: [INSERT NUMBER]).

*Contact Details*

Full name of legal entity: Dr Taryn Talbott trading as Woodville Psychology

Postal address: Office 75165, PO Box 92, Cardiff, CF11 1NB

Email address: woodvillepsychology@outlook.com

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at woodvillepsychology@outlook.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

*Changes to the privacy policy and your duty to inform us of changes*

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

*Third-party links*

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

 *What data do we collect about you, for what purpose and on what grounds we process it*

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

* **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
* **Customer Data** that includes data relating to any purchases of services such as your name, title, billing address, delivery address email address, phone number, contact details, referral source, purchase details and your card details. We may also collect an emergency contact details (name and number). You must ensure you have permission from that person to share their personal data with us. We process this data to supply the services you have purchased, to carry out invoicing and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
* **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
* **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and decide our marketing strategy.
* **Marketing Data** that includes data about your preferences in receiving marketing from us and your communication preferences. We process this data to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
* **Sensitive Data** We need to collect the following personal data about you, your child and any services you receive from us, which is known as a special category of data under the law, meaning that it must be handled even more sensitively. This may include the following: -
* Your name, your child’s name, date of birth and gender.
* Contact details, such as postal address, email address and telephone/mobile numbers.
* Financial information used to pay for our services.
* Communication data in text messages, emails and voicemails.
* Details of the mental and physical health of people within the family, including information about any health or social care you may have received from other providers such as GPs, counsellors or hospitals, as well as medications administered.
* Background information relevant to the presenting problem.
* Session notes, including a contact log, letters, notes, assessments and questionnaires associated with any support we offer, kept in accordance with guidelines from our professional body.

We may become aware of some other Special Category Data, such as sexuality, or religious or political beliefs, during our time working together. We will not ask for this information and you do not have to disclose it if you do not wish to. Any Special Category Data that is disclosed during our work together will be treated confidentially and processed as outlined in this policy.

We have a legitimate interest in using this data as clinical psychologists to provide psychological assessment and intervention, in accordance with the guidelines of our governing body. We will only use your data for the purpose of providing these services to you and for processing payment for these services.

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver our services to you or your child). If you don’t provide us with the requested data, we will have to terminate our service for you/your child as we are unable to practice without this information.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at woodvillepsychology@outlook.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

*How we collect your personal data*

We may collect data about you by you providing the data directly to us (for example by filling in the contact form on our website, by sending us emails or engaging in any form of assessment or therapy sessions with us, as part of our service). With your explicit consent, we may also obtain data from other agencies involved in your care such as GPs or previous mental health workers if this seems appropriate and useful. We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this [INSERT LINK TO COOKIE POLICY].

*Marketing Communications*

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we will only provide you with marketing communications from us if (i) you made a purchase or asked for information from us that is relevant to our business or services or (ii) you specifically agreed to receive marketing communications and in each case you have not opted out of receiving such communications since.

If you opt out of receiving marketing communications, this opt-out does not apply to personal data provided as a result of other transactions, such as purchases.

As a provider of private healthcare services, we need to carry out these marketing services but are mindful of your rights and expectations in that regard.

*Who do we share your data with?*

We take the protection of personal and sensitive data very seriously. In administering services and adhering to professional and regulatory guidelines, we may have to share your personal or sensitive data with the parties set out below:

* Outside organisations that are directly involved in your care, for example, your GP or health insurance providers. The process of transmitting information will always be in accordance with GDPR rules (for example, using encrypted email software).
* Clinical Psychologists are required to have regular supervision to maintain high standards, and so data may be shared with a supervisor. Steps will be made to protect your family’s identity. We use initials only and do not share identifying details with our supervisors.
* Service providers who provide IT and office administration services, including WebHealer (website design and hosting) and Outlook (email provider).
* Online video providers such as Microsoft Teams and Zoom (who are based in the US) – you will need to check their privacy policy here:

Teams: <https://privacy.microsoft.com/en-gb/privacystatement>,

Zoom: <https://zoom.us/privacy> before utilising their service.

* Professional advisors including lawyers, bankers, auditors and insurers.
* Government bodies that require us to report processing activities.

We require all third parties to whom we transfer your data to respect the security of your personal data and treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

*International Transfers*

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the UK, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

* We may transfer your personal data to countries that the United Kingdom regulatory authorities have approved as providing an adequate level of protection for personal data by; or
* If we use US-based providers that are part of UK regulator approved privacy framework we may transfer data to them, as they have equivalent safeguards in place; or
* Where we use certain service providers who are established outside of the UK, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

*Data Security*

We take your privacy very seriously and have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

The personal data we hold about you is stored securely. We keep paper-based records in a locked filing cabinet. We keep electronic records on a password protected computer. This is backed up regularly to ensure that data is not lost if there is an unexpected incident that affects our ability to access the original records.

We also allow access to your personal data only to those who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

*Data Retention*

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. For example, mental health records are subject to special legislation and must be securely retained for a minimum of 7 years after your last session (if you are over 18).

https://www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Where personal information is shared in an enquiry and you are not offered any further services from us, all personal data will be deleted.

*What are my rights?*

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

* If you want us to establish the data's accuracy.
* Where our use of the data is unlawful but you do not want us to erase it.
* Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
* You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.