

PRIVACY POLICY

1 INTRODUCTION

- 1.1 Welcome to the RGPC Limited's privacy policy.
- 1.2 RGPC Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you.
- 1.3 When you use our website, social media pages or provide personal information to us by other means, you consent to us collecting and using the information in the ways set out in this policy.

2 IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy policy

- 2.1 This privacy policy aims to give you information on how RGPC Limited, trading as Rachel Griffiths Counselling, collects and processes your personal data through your use of this website, including any data you may provide through this website and/or when you complete the contact form on our website (including your name, contact details and email address).

Controller

- 2.3 RGPC Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).
- 2.4 If you have any questions about this privacy policy or our privacy practices, please contact Rachel Griffiths by post at the registered office of RGPC Limited (registered in England and Wales under company number 13746859) or via email to rachel@rachelgriffithscounselling.com.
- 2.5 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

- 2.6 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

- 2.7 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.

3 THE DATA WE COLLECT ABOUT YOU

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 3.2 Information we routinely collect may include details such as your name, address, phone number, email address, details of your enquiry so that we can provide the service you require.
- 3.3 We may collect, use, store and transfer different kinds of personal data about you as follows:
- Information you provide when completing the contact form on our website or the intake form (including name, address, telephone number and email address) or the information generated in the course of the use of those services).
 - Information from your computer including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
 - Information about how you use our website.
 - Information that you post to our website or social media pages for publication on the internet (including your user name, your profile pictures and the consents of your post).
 - Any other personal information that you choose to send us.

4 HOW IS YOUR PERSONAL DATA COLLECTED?

- 4.1 We use different methods to collect data from and about you including through:
- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - submit the contact form on our website.
 - complete an intake form.
 - give us feedback or contact us.
 - **Automated technologies or interactions.** As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- 4.2 Before you disclose to us the personal information of another person, you must have that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

5 HOW WE USE YOUR PERSONAL DATA

5.1 We will only use your personal data for the purposes specified in this policy or for the services set out on the relevant pages of our website or when the law allows us to.

5.2 We will use your personal data to:

- Administer our website and business.
- Where we need to perform the services we are about to enter into or have entered into with you.
- Send you non-marketing commercial communications.
- Send you email notifications that you have specifically requested.
- Deal with enquires and complaints made by or about you relating to our website.
- Keep our website secure and prevent fraud.
- Verify compliance with the terms and conditions governing the use of our website.
- Where we need to comply with a legal obligation.

5.3 Please see paragraph 13 to find out more about the types of lawful basis that we will rely on to process your personal data.

6 THIRD-PARTY MARKETING

6.1 We will never sell your information or share it with other organisations for marketing purposes without your express consent. This is a confidential service.

7 COOKIES

7.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

7.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

7.3 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

8 CHANGE OF PURPOSE

8.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

8.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

8.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9 DISCLOSURES OF YOUR PERSONAL DATA

9.1 We will not disclose your personal information to anyone. This is a confidential service. We may however have to disclose your personal information:

- To the extent that we are required to do so by law;
- In connection with any ongoing perspective legal proceedings; or
- In order to establish, exercise or defend our legal rights (including information to other for the purpose of fraud prevention).

10 INTERNATIONAL TRANSFERS

10.1 The information that we collect will not be stored and processed in, and transferred between, any of the countries in which we operate.

11 DATA SECURITY

11.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

11.2 In addition, we limit access to your personal data to those employees who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

11.3 We have taken the following steps to ensure that all data is secure:

- Electronic hardware is either under my supervision or secured in a locked or restricted area at all times;
- Session notes and client contact details are kept and locked separately from each other;
- Emails and texts are deleted regularly and at the end of the counselling unless relevant to the notes;
- Secure passwords are used on my computers and mobile phone;
- Paper information is either under supervision or secured in a locked and restricted area and transmitted through sealed and addressed envelopes.

12 DATA RETENTION

How long will you use my personal data for?

12.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

12.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can

achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

- 12.3 By law, and accordance with professional bodies and insurers, we have to keep personal details of our clients for seven years after they cease being clients. These records are destroyed at the end of this period
- 12.4 In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

Your legal rights

- 12.5 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:
- 12.6 If you wish to exercise any of the rights set out above, please contact us

No fee usually required

- 12.7 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

- 12.8 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

- 12.9 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.

13 GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

14 YOUR LEGAL RIGHTS

14.1 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.