



Privacy Policy

You may be aware of new laws relating to General Data Protection Regulation (GDPR) that are in effect from 25 May 2018. The purpose of GDPR is to provide a set of standardised data protection laws across all EU member countries. This document sets out how Hidden Gem Psychology Service complies with these laws.

We take the privacy rights of all its clients seriously and adopt a high standard of compliance and confidentiality when dealing with your data. We want you to know that this is a safe place for you to discuss your feelings and concerns and we operate in a highly confidential environment. This privacy policy sets out the details of how data is collected and processed through the use of our website.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Hidden Gem Psychology collects and processes your personal data through your use of this website and the use of our services and treatments. This website is not intended for children, and we do not knowingly collect data relating to children via our website.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal or sensitive data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Gemma McKenzie of Hidden Gem Psychology is the data controller and is responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Associates taking on referrals with Hidden Gem Psychology will be additional data controllers for the clients they work with directly and may have access to more data than Gemma McKenzie due to the confidential nature of their therapy work with a specific client. In such cases, associates will be the primary data controller for those clients.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data controller on admin@hiddengempsychology.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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. This version was last updated in August 2022. 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.

The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes 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.
- Usage Data includes information about how you use our website, products, and services.
- Sensitive Data includes information about your health, including information about your existing 3 and previous medical conditions, medication details, psychiatric history and any other relevant health information to enable us to carry out our services to you.

We require your explicit consent for processing sensitive data, so when you submit your details, we will ask you to confirm your consent to this processing via the consent tick boxes on our registration forms.

It may be necessary to collect certain additional types of data about you during our assessment and/or therapy sessions. If so, we will ask you to confirm your consent.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform

the contract we have or are trying to enter into with you (for example, to provide you with services or goods). In this case, we may have to cancel a service or product you have with us but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms before or during an appointment, verbally during discussions at our practice, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: • apply for our services or any of our products; • subscribe to our service or publications; or • give us feedback or contact us.

- Automated technologies or interactions. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below: Technical Data from the following party: (a) analytics providers such as Wix and Google.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent when collecting sensitive data (such as health information) via email or text message.

Marketing

We do not use your personal data to send you marketing information. We also do not share any of your personal data with any third parties for marketing purposes

Cookies

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.

Change of purpose

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.

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. 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.

Disclosures of your personal data

We may share your personal data with the parties set out below

- Service providers, acting as processors who provide IT and system administration services, such as Writeupp for our therapy/assessment notes, room booking systems and Zoom for online consultations.
- Professional advisers, acting as processors or joint controllers, including healthcare professionals (including associates and other psychologist clinicians who we may refer your case to), lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators, and other authorities, acting as processors or joint controllers, based who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal and sensitive data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal and sensitive data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Please note that any transfer of sensitive data is carried out under strict security obligations on our third-party service providers.

In exceptional circumstances, we might need to share personal information with relevant authorities:

- When there is need-to-know information for another health provider, such as your GP.
- When disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty, for example a Court Order.
- When the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.

Data security

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. In

addition, we limit access to your personal data to those employees, agents, contractors and other third parties 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.

All information recorded on paper will be securely stored in a locked filing cabinet. Confidential digital information will be stored in a secure cloud service offering high levels of security.

Confidential information containing sensitive data or information will be sent via the internet will be encrypted and/or password protected (password sent separately by text). Letters sent to professionals such as GPs, by surface mail, will be clearly marked 'Private and Confidential'. All electronic devices (e.g. computer, laptop and phone) used to access stored information will themselves be password protected.

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

Data retention

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.

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. Consultation notes and questionnaires will be held for varying lengths of time depending on the content and then carefully disposed of. Some records may be held indefinitely, e.g., if there were any issues that could lead to police investigation in the future. Your records will be kept for 7 years after the conclusion of our contract, in line with the British Psychological Society guidance. By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see your legal rights below for further information. In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your right to access the personal information we hold about you

- You have a right to access the information we hold about you.
- We will usually share this with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- We may request further evidence from you to check your identity.
- A copy of your personal information will usually be sent to you in a permanent form (that is, a printed copy).
- You have a right to get your personal information corrected if it is inaccurate.
- You can complain to a regulator. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office.

Hidden Gem Psychology reserves the right to refuse a request to delete a client's personal information where this is therapy records. Therapy records are retained for a period of 7 years in accordance with the guidelines and requirements for record keeping by The British Psychological Society

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.