

Select Psychology Privacy Policy

Select Psychology is committed to protecting and respecting your privacy.

We understand that your personal data is entrusted to us and we appreciate the importance of protecting and respecting your privacy. To this end we comply fully with the data protection law in force in the UK (“Data Protection Laws”) and with all applicable clinical confidentiality guidelines.

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. It explains our practices regarding the collection, use, storage and disclosure of personal information that we hold about you.

Please read the following carefully to understand our practices regarding your personal data, how we will treat it and your rights in relation to that data. By providing your personal data to us or by using our services, website or other online or digital platforms(s) you are accepting or consenting to the practices as described or referred to in this Privacy Policy.

For the purpose of Data Protection Laws, the data controller is Select Psychology with registered address at: 1 Tynemouth Road, North Shields, NE30 4AY in England and Wales Number 9395957.

When we refer to ‘we’, ‘us’ and ‘our’, we mean Select Psychology.

What personal data may we collect from you?

When we refer to personal data in this policy, we mean information that can or has the potential to identify you as an individual.

Accordingly, we may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit one of our websites, complete a form, access our services or speak to us.

Personal data we collect from you may include the following:

- information that you give us when you enquire or become a customer or patient of us or apply for a job with us including name, address, contact details (including email address and phone number)
- details of referrals, quotes and other contact and correspondence we may have had with you
- details of services and/or treatment you have received from us or which have been received from a third party and referred on to us
- information obtained from customer surveys, promotions and competitions that you have entered or taken part in
- notes and reports about your health and any treatment and care you have received and/or need, including about visits to our clinic's
- patient feedback and treatment outcome information you provide
- information about complaints and incidents
- information you give us when you make a payment to us, such as financial or credit card information
- other information received from other sources, including from your use of websites and other digital platforms we operate or the other services we provide, information from business partners, advertising networks, analytics providers, or information provided by other companies who have obtained your permission to share information about you.

Where you use any of our websites, we may automatically collect personal data about you including:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform,
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

The data that we request from you may include special category data. This includes information that relates to the following:

- racial or ethnic origin, or
- political opinions, or

- religious or philosophical beliefs, or
- trade union membership, or
- genetic data, biometric data for the purpose of uniquely identifying a natural person, or
- health data,
- or data concerning a natural person's sex life or sexual orientation.

When do we collect personal data about you?

We may collect personal data about you if you:

- visit one of our websites
- enquire about any of our services
- register to be a customer or patient with us or book to receive any of our services
- fill in a form or survey for us
- carry out a transaction on our website
- participate in a competition or promotion or other marketing activity
- make online payments
- contact us, for example by email, telephone or social media
- participate in interactive features on any of our websites.

What personal data we may receive from third parties and other sources?

We may collect personal data about you from third parties such as:

- If you are an employee of one of our corporate clients who has taken up one of our services, we may be passed your name, contact number and email address, in order to get in touch with you to arrange an appointment or collect further information from you;
- We have a number of independent third parties acting on our behalf who may collect personal data from you to allow us to carry out the services we offer e.g. an independent General Practitioner may carry out a consultation and collect personal data from you which is subsequently shared with Select

Psychology for the continuity of your care and may be used for quality and monitoring purposes;

- We may receive information from the NHS and for the continuity of your care we may be passed medical information usually in the form of a referral for the purposes of your treatment with Select Psychology or a third party consultant;
- Insurance providers will pass Select Psychology personal data of patients who have commenced a claim and require treatment with Select Psychology. This will normally be in the form of a referral and may consist of basic details e.g full name, date of birth, address, contact number and email address and the type of procedure/treatment they require.

How do we lawfully process your personal data?

Your personal data will be kept confidential and secure and will only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws, clinical records retention periods and clinical confidentiality guidelines.

Set out below are some of the ways in which we process personal data although to do so lawfully we need to have a legal ground for doing so. We normally process personal data if it is:

- necessary to provide you with our services - to enable us to carry out our obligations to you arising from any contract entered into between us and you including relating to the provision by us of services or treatments to you and related matter such as billing, accounting and audit, credit or other payment card verification and anti-fraud screening
- in our or a third party's legitimate interests to do so - see details below
- required or allowed by any applicable law
- with your explicit consent for example direct marketing communications

Generally, we will only ask for your consent to processing if there is no other legal grounds to process. In these circumstances, we will always aim to be clear and transparent about why we need your consent and what we are asking it for. Where we are relying on consent to process personal data you have the right to withdraw your consent at any time by contacting us using the details below and we will stop the processing for which consent was obtained.

To process special category data we rely on additional legal grounds and generally, they are as follows:

- With your explicit consent
- It is necessary for the purposes of treatment, to assess whether you are able to work, to provide health or social care treatment, or to manage health or social care systems and services. This may also include monitoring whether the quality of our services or treatment is meeting expectations.
- It is necessary to establish, make or defend legal claims or court action
- It is necessary so that we can comply with employment law
- It is necessary for a public interest purpose in line with any laws that are applicable. This should assist in protecting the public against dishonesty, malpractice or other seriously improper behaviour for example, investigating complaints, clinical concerns, regulatory breaches or investigations e.g HCPC or ICO.

Processing of personal data which you have made public:

As stated above, one of the legal grounds for processing data is where it is in our legitimate interest to do so, taking into account your interest's rights and freedoms. This allows us to manage the relationship that exists between you and us and can include the following reasons:

- provide you with information, products or services that you request from us
- managing all aspects of our relationship with you, our products and services and any third parties who may provide products or services on our behalf
- allow you to participate in interactive features of our services, when you choose to do so
- notify you about changes to our products or services
- keep our records up to date
- respond to requests where we have a legal or regulatory obligation to do so
- check the accuracy of information about you and the quality of your treatment or care, including auditing medical and billing information for insurance claims as well as part of any claims or litigation process
- support your psychologist, counselor or other healthcare professional
- assess the quality and/or type of care you have received (including giving you the opportunity to complete customer satisfaction surveys) and any concerns or complaints you may raise, so that these can be properly investigated
- to conduct and analyse market research
- to ensure that content from any of our websites is presented in the most effective manner for you and for your computer

- to allow us to enforce our website terms of use, our policy terms and conditions or other contracts, or to protect our or other's rights, property or safety
- to share your personal information with people or organisations in order to run our business or comply with any legal and/or regulatory obligations including to defend ourselves from claims, exercise our rights and adhere to laws and regulations that apply to us and the third parties we work with
- to take part in, or be the subject of, any sale, purchase, merger or takeover of all or part our business.

The security of your personal data

We protect all personal data we hold about you by ensuring that we have appropriate organisational and technical security measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent personal data being lost, destroyed or damaged. We conduct assessments to ensure the ongoing security of our information systems. Any personal data you provide will be held for as long as is necessary having regard to the purpose for which it was collected and in accordance with all applicable UK laws.

Personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where we transfer your personal data outside the EEA, we will ensure that there are adequate protections in place for your rights, in accordance with Data Protection Laws. By submitting your personal data, and in providing any personal data to us, you understand the basis for this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored securely. Any payment transactions on our website will be processed securely by third party payment processors. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet cannot be guaranteed as completely secure. However, we ensure that any information transferred to our websites is via an encrypted connection. Once we have received your

information, we will use strict procedures and security features to minimise the risk of unauthorised access.

At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission; if you choose to send or receive such information via email, you do so understanding the risks associated with doing so.

How long do we retain your personal data?

Unless we explain otherwise to you, we will retain your personal data on the basis of the following guidelines:

- for as long as we have a reasonable business need, such as managing our relationship with you and managing our business
- for as long as we provide services and/or treatment to you and then for as long as someone could bring a claim against us (in general this is a period of 8 years); and/or
- in line with legal and regulatory requirements or guidance.

Disclosure of your personal data to third parties

In the usual course of our business we may disclose your personal data (which will be limited to the extent reasonably necessary) to certain third party organisations that we use to support the delivery of our services. This may include the following:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with you,
- organisations providing IT systems support and hosting in relation to the IT systems on which your information is stored,
- third party debt collectors for the purposes of debt collection,
- delivery companies for the purposes of transportation,
- third party service providers for the purposes of storage of information and confidential destruction, third party marketing companies for the purpose of sending marketing emails, subject to obtaining appropriate consent.

Where a third party data processor is used, we ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under Data Protection Laws.

We may also disclose your personal data to third parties in the event that we sell or buy any business or assets or where we are required by law to do so.

Special Category information collected during provision of treatment or services

Special category data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Policy. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies. Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment expenses or their agents. It may also be provided to external service providers and regulatory bodies (unless you object) for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

Mental health professionals working with us: We share clinical information about you with our mental health professionals as we think necessary for your treatment. Mental health professionals working with us might be our employees, or they might be independent consultants in private practice. In the case of independent consultants, the consultant is the data controller of your personal data, either alone or jointly with us and will be required to maintain their own records in accordance with Data Protection Laws and applicable clinical confidential guidelines and retention periods. Where that is the case, we may refer you to that consultant to exercise your rights over your data. Our contracts with consultants require them to cooperate with those requests. In all circumstances, those individual consultants will only process your personal data for the purposes set out in this Privacy Policy or as otherwise notified to you.

External practitioners: If we refer you externally for treatment, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Your GP: If the practitioners treating you believe it to be clinically advisable, we may also share information about your treatment with your GP. You can ask

us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.

Your insurer: We share with your medical insurer information about your treatment, its clinical necessity and its cost, only if they are paying for all or part of your treatment with us. We provide only the information to which they are entitled. If you raise a complaint or a claim we may be required to share personal data with your medical insurer for the purposes of investigating any complaint/claim.

The NHS: If you are referred to us for treatment by the NHS, we will share the details of your treatment with the part of the NHS that referred you to us, as necessary to perform, process and report back on that treatment.

Practice Regulators: We may be requested – and in some cases can be required - to share certain information (including personal data and special category data) about you and your care with regulators such as the Health and Care Professions Council (HCPC), for example if you make a complaint, or the conduct of a health and care professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.

From time to time we may also make information available on the basis of necessity for the provision of healthcare, but subject always to patient confidentiality.

In an emergency and if you are incapacitated, we may also process your personal data (including special category data) or make personal data available to third parties on the basis of protecting your ‘vital interest’ (i.e. your life or your health).

We will use your personal data in order to monitor the outcome of your treatment by us and any treatment associated with your care, including any NHS treatment.

We participate in internal audits and initiatives to help ensure that patients are getting the best possible outcomes from their treatment and care. The highest standards of confidentiality will be applied to your personal data in accordance with Data Protection Laws and confidentiality. Any publishing of this data will

be in anonymised, statistical form. Anonymous or aggregated data may be used by us, or disclosed to others, for research or statistical purposes.

What do we do with any non-personal information collected when accessing the website?

Certain information which you submit may also be collected to enable us to better understand our customers, to improve our website, to inform general marketing and to help provide a better experience of our services. We may use cookies to do this.

We may also use other companies to set cookies on our websites and gather cookie information for us – please refer to the information detailed below. From time to time we may also analyse Internet Protocol (IP) addresses or other anonymous data sources.

Cookies

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

By law, website operators are required to ask for a website user's permission when placing certain kinds of cookie on their devices for the first time.

Where consent is required, the law states that it should be “informed consent”, which means we must ensure that you understand what cookies are and why we want to use them.

We are committed to providing the best digital service to you whilst at the same time fully protecting your privacy. For further information on our cookies policy and how we use cookies through use of all our online services, please see below.

What are Cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improving your user experience.

They can also help to ensure that adverts you see online are more relevant to you and your interests.

CATEGORY 1 COOKIES

These cookies are essential in order to enable you to move around our websites and use its features, such as accessing secure areas of the websites. Without these cookies, services you have asked for cannot be provided.

Your consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by you.

We use these types of cookies.

CATEGORY 2 COOKIES

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All the information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioral/ targeted advertising networks.

We use these types of cookies. By using our website and online services you agree that we can place these types of cookies on your device.

CATEGORY 2 COOKIES

These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can

customise. They may also be used to provide services you have asked for such as watching a video. The information these cookies collect is generally anonymised and they cannot track your browsing activity on other websites.

We use these types of cookies. By using our websites these you agree that we can place these types of cookies on your device.

CATEGORY 4 COOKIES

These cookies are used to deliver adverts more relevant to you and your interests They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

We do not use these cookies on our website.

Definitions used above are consistent with those supplied by the International Chamber of Commerce 'ICC UK Cookie Guide' April 2012.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

For more information on our position on the use of cookies, please contact us: Select Psychology, 1 Tynemouth Road, North Shields, NE30 4AY.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential Category 1 Cookies) you may not be able to access all or parts of our websites. For information on how to delete cookies, please refer to: use <https://ico.org.uk/for-the-public/online/cookies>

Marketing

If you have consented to our processing your personal data for marketing purposes, in accordance with this Privacy Policy, we may send you information

(via mail, email, phone or SMS) about our products and services which we consider may be of interest to you.

You have the right to withdraw your consent to our processing your information in this way at any time. If you no longer wish to receive web based marketing information you can unsubscribe by emailing info@selectpsychology.co.uk

For non-web based marketing information please write to: Select Psychology, 1 Tynemouth Road, North Shields, NE30 4AY.

We would ask you to give us a reasonable amount of notice, to give us time to update our systems. While the precise timings vary by department we generally ask that you give us at least 30 days' notice.

Your Rights under Data Protection Laws

The law gives you certain rights in respect of the personal data that we hold about you as well as information about what we do with it, who we share it with and how long we will hold it for. We may make a reasonable charge for additional copies of that data beyond the first copy, based on our administrative costs. The website of the Information Commissioner's Office (<http://www.ico.org.uk>) has a wealth of useful information in respect of your rights in your personal data. In addition to your right to stop marketing, detailed above, below is a short overview of the most commonly-used rights.

- Data Subject Access Request - With some exceptions designed to protect the rights of others, and subject to payment of a small administrative fee (currently £10, or up to £50 for paper-based health records), you have the right to a copy of the personal data that we hold about you
- The Right of Erasure ('Right to be Forgotten') - the right to have your personal information erased where we have no reason to continue processing;
- Data Portability - the right to move, copy or transfer personal information you have provided to us;
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.
- Right to Rectification - You have the right to have the personal data we hold about you corrected if it is factually inaccurate. It is important to understand that this right does not extend to matters of opinion, such as psychological assessment. If any of your personal data has changed, especially contact information such as: email address, postal address and phone number please

get in touch with us on 0191 258 0008 so we can ensure your personal data is kept up to date

If you want to exercise your rights in respect of your personal data, the best way to do so is to contact us by email on info@selectpsychology.co.uk, or to write to us for the attention of the data protection officer at the address below. In order to protect your privacy, we may ask you to prove your identity before we take any steps in response to such a request.

Data Protection Officer, Select Psychology, 1 Tynemouth Road, North Shields, NE30 4AY

If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website (<http://www.ico.org.uk>).

Changes to our Privacy Policy

We keep our Privacy Policy under regular review and as a result it may be amended from time to time without notice. As a result we encourage you to review this Privacy Policy regularly.

Contact

If you have any questions in relation to our privacy policy, please email us at info@selectpsychology.co.uk or write to the Data Protection Officer at:

Select Psychology
1 Tynemouth Road
North Shields
NE30 4AY