

## **Privacy Statement**

### **Cookies**

Like many websites, we use cookies. A cookie is a small amount of data that is sent to your computer or mobile phone browser from a website's computer and is stored on your device's hard drive.

Cookies record information about your online preferences. They help us understand how visitors engage with our site so that we can improve your online experience with us. We do not use cookies to collect personally identifiable information about you.

Each website you visit can send its own cookie to your browser if your browser's preferences allow it. To protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites.

### **How to control and delete cookies**

You may restrict or block the cookies which are set by our website, or any other website, through your browser settings. You can also ask your browser to alert you when a cookie is issued.

For more information about cookies and how to manage them is available at [www.aboutcookies.org](http://www.aboutcookies.org)

We use Google Analytics to understand how visitors engage with our website. It collects information anonymously and reports website trends without identifying individual visitors. For more information visit [Google Analytics privacy and security information](#).

## **The Practice Privacy notice**

### **General**

The Practice provides rooms for therapists to use while engaging in their private practice. The Practice is registered as a data controller with the Information Commissioner's Office (ICO). Registration number TBCTBCTBC

If you have any questions regarding this policy, please contact our Data Protection Lead, using the following details:

The Data Protections Lead

The Practice

20 Great Portland Street

London

W1W 8QR

Email: [dataprot@thepractice.org.uk](mailto:dataprot@thepractice.org.uk)

The Practice operates <https://www.thepractice.org.uk/> and takes privacy and confidentiality very seriously. This policy informs you how we collect personal information. Personal information is held strictly in accordance with the Data Protection Act 2018. The Practice may at times modify, alter and update this Privacy Policy. We will notify you of any changes to this Privacy policy by posting the amended version on our website.

The Practice provides therapy rooms to members and we only collect the personal data required to carry out these functions, we do not collect any data relating to our practitioner's clients.

This policy applies to information we collect about:

Visitors to our websites

Therapist Practitioners

People Who Email Us

#### *Visitors to our websites*

When someone visits our Site, we collect standard internet log information and details of visitor behaviour patterns, we do this to find out things such as the number of visitors to the various parts of our site. We collect this information in a way that does not identify anyone. The exception to this is logging into the therapist's booking area, where there is a need to identify our members.

We may use your personal information to monitor and improve our website site. By using our website, you agree to the collection and use of information in accordance with this policy.

The Practice website comprises <http://www.thepractice.org.uk> and any other subdomains required for delivery of additional content or services.

#### *Therapist Practitioners Area of the website.*

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Any personally identifiable information may include but is not limited to your name and IP address ("Personal Information"). This can be when you are booking a room or submitting an enquiry through our website for example.

#### *Use of cookies by The Practice*

Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

#### *Search engine*

Search queries and results are logged anonymously to help us improve our website and search functionality, no user-specific data is collected by either The Practice or any other third party.

Where possible, we do not request personal identifiable information unless it is necessary for the functionality of the service being provided. We will not request more information than necessary to supply the service. We will only use details to provide the service the person has requested and for other closely related purposes. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

When financial transactions take place online, personal details such as name and address are stored on the The Practice servers. Where a third-party processor has been used, we will have agreements with them to protect your information so that it is stored securely and in line with GDPR.

#### *People who email us*

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Your emails will be stored by the relevant departments in accordance with The Practice's retention policy.

#### *Communications*

We may use your personal details to administer the website this information will include name, email address, phone number and photo. Our process for this involves informed consent.

The form we use has contact details on it, so if someone prefers for their image not to be used, or if they wish to 'disappear', we can delete the image from our library.

#### *Complaints about The Practice*

All complaints about The Practice are treated seriously and we will only use the personal information we collect to process the complaint and to check on the level of service we provide.

#### *Complaints about our Therapists*

The Practice only provides rooms for private practice therapy sessions any complaints should be made directly to the therapist in the first instance, or to any professional body the therapist is registered with.

### **Therapist information**

We ask all of our therapists to provide certain types of information so that we are able to process their payments and create a record on our database together with a record of their room bookings. This includes:

Name

Home address (this is kept confidential and is for internal use only)

Work address

Telephone number

Personal email address

Work email address

Date of birth

This information is processed in accordance to our policy and isn't shared with any third parties. We collect this data and run these processes in order to carry out our business functions

Consent – When new therapists register with The Practice, they are asked to provide details to allow us to ensure that we can provide our services. You can withdraw your consent at any time by contacting the Data Protection Lead at [dataprotection@thepractice.org.uk](mailto:dataprotection@thepractice.org.uk)

Contract – In order to perform our obligations to our therapists, we need to process their personal data.

Legitimate interests – Where it is necessary to process personal data for our purposes as an organisation (our “legitimate interests”), we may do so provided that this does not override the rights and freedoms of the person whose data we are processing.

## **Your rights**

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: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. 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.

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](http://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 this privacy notice

We aim to keep this notice under review to reflect changes to law or practice.

Document Created January 2020

Updated: February 2020