

Privacy Notice

This is the Privacy Notice of Sue Renger. Simply expressed, it promises to respect the confidential nature of your personal information by keeping it secure, to make sure it isn't shared inappropriately and to allow you to view, change or delete it should you want to.

Sue Renger is a sole trader practising in the UK using a website hosted by Wix and analysed by Google Analytics. Payments are processed by PayPal. The business address of Sue Renger is The Guildhall, Tideswell, Derbyshire, SK17 8NT.

In this document, "we", "our", or "us" refer to business conducted by Sue Renger.

Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our notice is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our notice complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, and also suggest that you read the information provided by the Information Commissioner's Office at <https://ico.org.uk>.

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website, or in person.

1 Data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial data includes information such as your bank account and payment card details.

Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.

We may process this kind of data if you contact us through our website, or purchase a product from the website.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity. However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We may collect special personal information about you through the course of a counselling relationship.

This special personal information is processed on the basis that it is necessary for the provision of health or social care or treatment, more specifically in this case - counselling services.

Your identity, your contact information and your purchasing data will be stored electronically by us and by our IT support services such as Wix and PayPal. Your counselling notes will be handwritten, pseudonymised and stored physically by us in Litton, Derbyshire.

2 The basis on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes, then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

2.1 Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, you provide your consent to us to process information that may be personal information.

When you contact us we keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies and this privacy policy before browsing.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us by email at sue@suerenger.co.uk. However, if you do so, you may not be able to use our website or our services further.

2.2 Information we process because we have a contractual obligation with you

When you buy a product or service from us, or otherwise agree to our terms and conditions in a counselling contract, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

If you have purchased goods, we will process this information in order to fulfil our contract to provide you with your purchases.

If there is a counselling contract between us, or you may enter into a counselling contract, we will process personal information and may also process special personal information.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

2.3 Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so. This applies particularly to a counselling relationship where we believe for example that harm may be caused to you or others if we do not act

2.4 Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

3 Your information is provided on the understanding that it may be shared with a third party

Our website is designed and hosted by Wix.com. Cookies are placed on your device by Wix and emails sent to us are stored on their servers. The privacy policy for Wix can be found at <https://www.wix.com/about/privacy>.

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

When you first visit our website, we ask you to accept the use of cookies by Wix and to accept this Privacy Policy. We assume that when you click 'Got it', you agree to the terms outlined in this document. Alternatively, you may navigate away from the website.

Your web browser should allow you to delete any cookies you choose. It also should allow you to prevent or limit their use.

Payments for products and services are processed by PayPal. The privacy policy for PayPal can be found at <https://www.paypal.com/uk/webapps/mpp/ua/privacy-full>. Bank account information is not transferred to or retained by us either through our website or otherwise. This is also the case if you pay for counselling services by cheque.

Requests by your web browser to Wix servers for web pages and other content on our website are recorded by Google Analytics. Their privacy policy can be found at <https://policies.google.com/privacy?hl=en-US>.

4 Security of data

Wix and PayPal use Secure Sockets Layer (SSL) certificates to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

Hand written information is retained in a locked filing cabinet accessed only by us.

5 Data may be processed outside the European Union

PayPal, Wix and Google Analytics have servers all over the world. Accordingly data obtained within the UK or any other country could be processed outside the European Union. We endeavour to ensure as far as possible that data processed outside of the UK is managed in line with UK legislation.

6 Your duty to inform us of changes

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

7 Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by contacting us at sue@suerenger.co.uk. To obtain a copy of any information you should contact us to make that request. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

8 Removal of your information

If you wish us to remove personally identifiable information from our website or counselling records, you should contact us to make your request. However, this may limit the service we can provide to you.

9 Use of site by children

We do not provide counselling services to children (under 18 yrs), although we do sell some products appropriate for children. If you are under 18, you may use our website only with consent from a parent or guardian.

10 Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with UK law, including for the period demanded by the UK tax authorities;
- to support a claim or defence in court.

Ordinarily, special personal information and client notes compiled during counselling sessions will be archived once therapy has been completed for a period of 3 years, unless you ask us to delete or destroy them at any other time. Be aware however, that should you decide to return for counselling, your notes will not be available to the counsellor for reference if they have been destroyed.

11 Review of this privacy notice

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted on our website on the day you use our website, or those contained in this document on the day on which it is signed. We advise you to retain a copy for your records.

If you have any question regarding our privacy notice, please contact us.

12 Complaints regarding your data

If you are not happy with our privacy notice or if you have any complaint about the way in which your data is managed then you should tell us.

Please email any complaints about data privacy in the first instance to sue@suerenger.co.uk.

If you complain about any of the content on our website, or data stored as part of your counselling contract with us, we shall investigate your complaint. When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

For example, a complaint made about counselling services may be referred to the British Association of Counselling and Psychotherapy for mediation.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

I have read, understand and agree to the terms laid out in this Privacy Notice.

X

Signed

X

Date