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## Privacy Policy

### Privacy Policy (GDPR)

General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European union that comes into effect from 25 May 2018. This document sets out how we comply with these laws.

In this policy, 'we', 'us' and 'our' refers to Be Your Authentic Self Ltd, as operated by Gavin McKee. We are registered in Northern Ireland under registration number N715904, and our registered address is at 37 Movilla Street, Newtownards, Co Down BT23 7JQ.

### Your rights

We are committed to protecting your rights to privacy. These rights are:

- Right to be informed about what we do with your personal data
- Right to have a copy of all the personal information we process about you
- Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed
- Right to restrict the processing of your personal data
- Right to object to the processing we carry out based on our legitimate interest

### What type of personal data is collected and processed

We collect information about you that may include personal or sensitive information, such as:

- Personal information: name or given name, family name or surname, address, telephone numbers, date of birth, gender (or preferred identity), age, relationships and children, occupation, telephone/SMS number, email address, video conference ID (if online therapy), GP contact details, school details (for children).
- Sensitive information: medical conditions (if relevant), prescribed medication, psychological history and current difficulties, and sexuality.
- Sensitive personal data: signed therapy contract, therapy records (therapist notes, letters, reports and/or outcome measures).
- To make sure that you are assessed and/or treated safely and appropriately, we record your personal information, as well as all contacts you have with us such as appointments and the results of assessments and letters relating to your care/report.
- We will also process personal data pursuant to legitimate interests in running the business such as invoices and receipts, accounts, VAT and tax returns.

### Web access collection of information

When you complete an online contact form, we will collect information about you and your internet protocol (IP) address. This is automatically supplied by the website software used to offer the form. Our website is hosted on the Wix.com platform. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall. We always try to minimise the amount of personal information required to provide a specific service or feature. All web services used by us are GDPR compliant.

### Cookies used by our service providers

Wix.com use cookies and those cookies may be stored on your computer when you visit our website. The cookies used are categorized as essential cookies and are detailed below:

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Cookie for fraud detection of calls	Session	Essential
hs	Security Cookie for Hive (legacy)	Session	Essential
svSession	Session cookie for identification	6 months	Essential
SSR-caching	Performance cookie for rendering	24 hours	Essential
TS*	Cookies for attack detection	Session	Essential
bSession	Used for system effectiveness measurement	24 hours	Essential
fedops.logger.sessionId	Tracking session errors and issues (resilience)	12 months	Essential
_wixAB3 *	Cookie for site experiments	6 months	Essential
server-session-bind	Cookie for API protection	Session	Essential
client-session-bind	Cookie for API protection	Session	Essential

We also use Google Analytics, which gathers information about the use of our website and uses cookies for this purpose. We use the information gathered by Google Analytics to analyse the use of our website. You can find out more about Google's use of information by visiting <https://policies.google.com/technologies/partner-sites> and you can review Google's privacy policy at <https://policies.google.com/privacy>. The cookies used by Google Analytics are named `_ga` and `_ga+container-id`.

### Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date information about managing cookies via these links:

- <https://support.google.com/chrome/answer/95647> (Chrome);
- <https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox);
- <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- <https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari); and
- <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

### **How your personal information is stored**

We take your privacy very seriously. We are committed to taking all reasonable steps to protect any individual identifying information that you provide. Once data is received, efforts are made to ensure its security on our systems. All personal information provided is stored in compliance with EU General Data Protection Regulations rules.

### **How long your personal information is stored for**

We do not keep your data for longer than is necessary. Basic contact information held on a therapist's mobile phone is deleted within 6 months of the end of therapy and the sensitive personal data defined above is stored for a period of 7 years after the end of therapy. After this time, this data is deleted at the end of each calendar year. Administrative data is retained for up to six years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for six years, it is destroyed as soon as possible.

### **What we do with your personal information**

We take your privacy seriously. We will only use your personal information to provide the services you have requested. If you do not provide the personal information requested, then we may be unable to provide a therapy service to you.

### **How your personal information is used**

We use the information collected to provide services to you, process payment for such services and send you information.

### **Who might we share personal information with**

We hold information about clients and the therapy they receive in confidence. However, 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.

### **What we will NOT do with your personal information**

We will not share your personal information with third-parties for marketing purposes.

### **How we ensure the security of personal information.**

Personal information is minimised in phone and email communication. Personal information is stored and managed via an online Patient Management System, password protected and compliant with the GDPR. You are encouraged to check the Patient Management System Privacy Policy available here: <https://www.wearekiku.com/privacy-notices>

Malware and antivirus protection, is installed on all computing devices. Mobile devices are protected with a passcode/Face ID, mobile security and antivirus software.

#### **Your right to access the personal information we hold about you**

- You have a right to access the information we hold about you.
- This will usually be shared with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- Further evidence from you to check your identity might be requested.
- 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 we have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).
- We reserve 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 National Counselling and Psychotherapy Society.

#### **Questions and contact information**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: [gavin@beyourauthenticself.co.uk](mailto:gavin@beyourauthenticself.co.uk)

#### **Changes to this privacy policy**

We reserve the right to update this privacy notice at any time, so please do check it frequently. If we make material changes to this policy, we will notify you that it has been updated.

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