

## Introduction

This privacy policy lays out of how I protect your personal data, respecting your privacy, and will fulfil your right of informing you how your personal information is fairly processed. I will not use any of your data for third party marketing or promotional purposes.

## Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 24<sup>th</sup> October 2022.

I reserve the right to modify this privacy policy at any time in accordance with current legislation. Changes will take effect immediately upon their posting on the website.

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal data changes during your time with me.

## 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. I do not control these third-party websites and are not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy notice of every website you visit.

## Data I collect, how it is collected and for what purpose

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, i.e. aggregated or anonymous data.

Different types of data that may be collected, used, and stored:

- **Identity Data** includes – first name, last name, and date of birth.
- **Contact Data** includes – billing address, email address and telephone numbers.
- **Financial Data** includes – bank account details.
- **Transaction Data** includes – details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes – internet protocol (IP) address, your login data, browser type, language 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 and our services.
- **Profile Data** is the data submitted when making your bookings and may include your username and password, services purchased by you, your interests, preferences, feedback.
- **Usage Data** includes – information about how you use our website, services.
- **Marketing and Communications Data** – includes your preferences in receiving marketing and your communication preferences.

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

- **Direct interactions.** You may give me your Identity, Contact and Financial Data by filling in forms or booking a session, agreements or by corresponding with me by phone, email or otherwise. This includes personal data you provide when you:
  - Apply for my services;
  - Enter into an agreement with me;
  - Subscribe to my service or publications;
  - Give me some feedback.
- **Automated technologies or interactions.** As you interact with my website, I may automatically collect Technical Data about your equipment, browsing actions and patterns. I collect this personal data by using server logs and other similar technologies.
- **Third parties or publicly available sources.** I may receive personal data about you from various third parties and public sources as set out below:
  - a) Analytics providers such as Google based outside the EU;
  - b) Credit and reference checking agencies

When you first come into contact about my services I will collect your name, email address, and phone number. When you book your initial consultation with me, I will send you an Initial Consultation Form asking you for further information, this includes your name, address, date of birth, contact number, occupation, GP name and address, name and contact number for next of kin, details of any medical conditions and prescribed medication, reason for your visit and other relevant health information. During your first appointment I will use the information from the Initial Consultation Form to collect data about your general emotional well-being, the reasons for your visit, and any other information that you may want to share with me. During the course of further sessions, I may also make notes of relevant information that you provide to me. I require this information in order to provide you with my services to a safe and professional standard and for safeguarding reasons.

### **Purposes for which I will use your personal data**

I have set out in the appendix (see table A), a description of all the ways I plan to use your personal data, and which of the legal bases I rely on to do so. I have also identified what our legitimate interests are where appropriate.

### **Marketing**

I strive to provide you with choices regarding certain personal data uses, particularly around marketing and communications.

You will receive marketing communications from me if you have requested information or entered into a contract for services from me or if you provided me with your details when you registered interest in one of my services and, in each case, you have not opted out of receiving that marketing.

### **Third-party marketing**

I do not sell your personal details to third party partners for marketing purposes.

## **Opting out**

You can ask me to stop sending you marketing communications emails at any time by following the opt-out links on any marketing or communication message sent to you or by contacting me at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of any contractual or legal relationship I have with you.

## **Log files**

When you visit this website I collect web statistics concerning your visit, which are stored in a log file. Log files allow me to record visitors' use of the site. Log files are also used to detect potential harmful users which may be reported to the relevant authorities.

## **Confidentiality and disclosure**

I may have to share your personal data with relevant third parties for the operation of your contract with Meadow Wellbeing. All information you provide to me is confidential, however, I may have to share it with a third party if I am required to do so by law or if circumstances arise which potentially affect your personal health and safety or the safety of other persons.

I require all third parties to respect the security of your personal data and to treat it in accordance with the law. I do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with my instructions.

Please note that the sharing of anonymous case histories with supervisors and peer support groups is not a breach of professional confidentiality.

## **Storage of data**

I am required to hold your details and session notes on file for 1-8 years. They may be kept in hard copy and/or computer. This information will be kept securely in accordance with data protection guidelines. You are entitled to a copy of this information and access should be requested in writing. You have the right to data portability in that you may obtain and reuse your data for your own purposes across different service providers. I will not release information I hold about you to any third party unless you give your explicit consent or unless I am required to do so by law or we deem it necessary for safeguarding purposes (please see Confidentiality and Disclosure above).

## **Withdraw consent at any time**

I am relying on your 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, I may not be able to provide certain products or services to you. I will advise you if this is the case at the time you advise us of your request to withdraw your consent.

## **Contact**

In accordance with your rights under data protection law if you would like to access, correct or amend any personal information we hold on record about you or register a complaint please contact me at [rachel@meadowwellbeing.com](mailto:rachel@meadowwellbeing.com).

## Appendix

Table A

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you on our key contacts database.	(a) Identity (b) Contact	Legitimate Interest – providing a service to new and existing clients as well as employees, contract
To process your agreement including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to keep our records updated (and pay monies owing or recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Informing you of relevant product and service updates (c) Sending our newsletter, invite to an event or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary for our legitimate interests – providing products and services (b) Necessary for our legitimate interests to keep our records updated as to areas of interest and to study how interested parties use our services.
To deliver relevant website content and potential available services to you and measure or understand the effectiveness of the details we share with you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how Leaseholder/client/occupiers use our services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, services, marketing, client / potential client relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of interested parties for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy.
To make suggestions and recommendations to you about products, services, events or updates that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our services and grow our business