

GDPR Data Protection:

Anagram Therapies Privacy Notice

This Notice describes how we collect, use, share, retain and safeguard personal data. It explains your individual rights that in summary include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.

WHAT IS PERSONAL DATA?

Personal data is information relating to an identified or identifiable natural person. Examples include an individual's name, age, and address, date of birth, gender and contact details.

Personal data may contain information which is known as *special categories of personal data*. This may be information relating to and not limited to, an individual's health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to sexual orientation.

Personal data may also contain data relating to criminal convictions and offences.

For the purposes of safeguarding and processing criminal conviction and offence data responsibly, this data is treated in the same manner as special categories of personal data, where we are legally required to comply with specific data processing requirements.

PERSONAL DATA WE COLLECT

In order for us to provide and administer our therapy services for you, we will collect and process personal data about you. We will also collect your personal data where you request information about our services, courses or events.

You may provide us with personal data when you contact us via the telephone, by e-mail or when writing to us directly. Consequently, you

may provide us with personal data when enquiring about our services, or where we provide you with paper based forms for completion or we complete a form in conjunction with you.

We will share personal data with authorised third parties, where we are required to do so by law and where we need to administer our events, for example, providing lists of attendees to a planned seminar.

We may collect your personal data when you visit our website, where we might collect your unique online electronic identifier; this is commonly known as an IP address.

Notes about therapy sessions are maintained by the therapist concerned and this is regarded as standard practice within our profession. These are intended for our own reference only and they will contain notes of the content of the sessions and therapeutic interventions employed, together with any subsequent reflections, theories or suppositions noted by the therapist.

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller. As a provider of your therapy services, we will process the following categories of data:

Personal data such as an individual's name, address, date of birth, gender, contact details and details of personal history.

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our therapy services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named

territory where the processing of personal data takes place.

If you require more information about our data handling processes or further details on how we collect personal data and with whom we share data with, please contact Anagram Therapies by email at info@anagramtherapies.com.

WHY DO WE NEED YOUR PERSONAL DATA?

We use your personal data for the administration of our services to you, including recording payments received and other book-keeping entries, and also to respond to any requests from you about services we provide and to process complaints. We may also use your personal data to manage your payments for our services, perform statistical analysis on the data we collect, for financial planning and business forecasting purposes and to develop new and market existing products and services.

We will use the special category and any criminal conviction data we collect about you for the performance of our contract with you which is deemed to be necessary for reasons of protecting the public interest.

Please note that, in the interests of clients, their circumstances and related therapy is sometimes discussed with professional peers and / or with our therapy supervisor. This is considered professional good practice. Please note, however, that where this happens, the identity of the client / clients is deliberately withheld and the greatest care is taken to ensure that no information is revealed which would otherwise reveal the identity of any of the people concerned.

In making use of our services you should understand that you are forming a contract with us and we consider ourselves as having a legitimate business interest to provide you with further information about our services. You may request to be withdrawn from all such marketing activities at any time.

In some situations we may request your consent to market our services to you, to share your data or to transfer your data outside the United Kingdom or the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting Anagram Therapies by email at info@anagramtherapies.com.

DATA RETENTION

We will retain your data for a minimum period of 10 years at the end of your services from Anagram Therapies.

Where you make a complaint we will retain the data for a minimum of 10 years.

Where we receive a complaint we will retain the data for a minimum of 10 years.

Where you or law enforcement agencies inform us about any active investigation or potential criminal prosecution, we will comply with legal requirements when retaining this data. The retention of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests, for statistical analysis (profiling) and product development and marketing purposes.

Sometimes we may need to retain your data for longer, for example if we are supporting you or defending ourselves in a legal dispute or as required by law or where evidence exists that a future complaint may occur. Please contact Anagram Therapies by email at info@anagramtherapies.com if you object to the use of, or you have any questions relating to, the use of your data, or to the retention of your personal data. You can opt out of receiving marketing services by e-mailing Anagram Therapies by email at info@anagramtherapies.com.

YOUR RIGHTS

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The right to be informed about the personal data being processed
- The right of access to your personal data
- The right to object to the processing of your personal data
- The right to restrict the processing of your personal data
- The right to rectification of your personal data
- The right to erasure of your personal data;
- The right to data portability (to receive an electronic copy of your personal data)

Rights relating to automated decision making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee. In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for prevention of crime and for regulatory and other statutory purposes. You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you

make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and / or health related matters. If you require further information on your Individual Rights or you wish to exercise your Individual Rights, please contact our Data Privacy Representative by e-mailing Anagram Therapies by email at info@anagramtherapies.com or by writing to Graham Dyster, Anagram Therapies, Holly Cottage, 2 Goat Lodge Road, Great Totham, Maldon, Essex, CM9 8BT.

PROTECTING YOUR DATA We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data with authorised third parties. Please note in this context that, in the interests of clients, their circumstances and related therapy is sometimes discussed with professional peers and / or with our therapy supervisor. This is considered professional good practice. Please note, however, that where this happens, the identity of the client / clients is deliberately withheld and the greatest care is taken to ensure that no information is shared which would lead to the identity of the people concerned being revealed.

DATA PRIVACY REPRESENTATIVE To ensure data privacy and protection has appropriate focus within our organisation we have a Data Privacy Representative, Graham Dyster, who also reports and liaises with his wife and fellow therapist, Anne Dyster. The Data Privacy Representative, Graham Dyster, may be contacted by email to Anagram Therapies at info@anagramtherapies.com .

COMPLAINTS

If you are dissatisfied with any aspect of the way in which we process your personal data please contact our Data Privacy Representative, Graham Dyster. You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's

Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/>, by live chat or by calling their helpline on 0303 123 1113.

HOW TO CONTACT US

If you have any questions regarding this Notice, the use of your data and your Individual Rights please contact our Data Privacy Representative, Graham Dyster, at Anagram Therapies by e-mail to info@anagramtherapies.com or by writing to Graham Dyster, Anagram Therapies, Holly Cottage, 2 Goat Lodge Road, Great Totham, Maldon, Essex, CM9 8BT or by telephoning 01621 893021.

Anagram Therapies is the business trading name of Graham Dyster. Graham and his wife Anne both currently serve as therapists for Anagram Therapies.

Friday 19th February, 2021