

PRIVACY POLICY

Introduction

This Website is owned by Resilient Wellbeing Ltd. Dr Norma Scevoli is a trading name of Resilient Wellbeing Ltd. This Privacy Policy is issued on behalf of Resilient Wellbeing Ltd thus, when we mention “we”, “us” or “our” we are referring to Resilient Wellbeing Ltd, a limited company registered in England & Wales under company number 12872501. Dr Norma Scevoli is the Data Protection Officer at Resilient Wellbeing Ltd registered with the Information Commissioner’s Office (ICO) under the Data Protection Act and the EU General Data Protection Regulation (GDPR).

Dr Norma Scevoli is a Counselling Psychologist registered with the Health and Care Professions Council (HCPC) and a Chartered Member of the British Psychological Society (BPS). She practices under the HCPC and BPS regulations, following their standards of proficiency, conduct and ethics.

We are committed to protecting the privacy and security of your personal information, in accordance with the EU General Data Protection Regulation (GDPR) and UK’s Data Protection Act 2018. This privacy policy explains how we abide by these laws as well as inform you of your rights under data protection law. This document applies to the collection, storage and processing of all data we collect about you and all data that is given to us by you in relation to the service you requested from us and/or to the use of our website.

This policy may change given the constant evolving of internet technologies as well as the development and growth of our website and business. Any changes will be reported on this page. This version was last updated on 01/06/2021.

Contact details:

Full name of legal identity: Resilient Wellbeing Ltd

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This privacy policy document contains the following sections:

1. THE DATA WE COLLECT ABOUT YOU
2. HOW WE COLLECT YOUR PERSONAL DATA
3. HOW WE USE YOUR PERSONAL DATA
4. DISCLOSURE OF YOUR PERSONAL DATA
5. DATA STORAGE AND DATA SECURITY
6. DATA RETENTION
7. EXTERNAL WEBSITES
8. YOUR RIGHTS ON YOUR PERSONAL DATA

1. THE DATA WE COLLECT ABOUT YOU

Personal information or personal data refers to any data about an individual that can lead to the identity of the individual. This does not include anonymised data, where the identity of the individual has been removed.

In order to offer you a safe and professional service, we collect the following different kinds of personal information about you:

- Personal identity data such as name and date of birth.
- Contact data such as address, telephone number and email address and communications exchanged with you.
- Organisations, individuals and services that are supporting you such as your GP/GP surgery details.
- Employment information.
- Consent - Signed therapy agreement.
- Records of transaction data - If you pay by bank transfer your name will appear on our bank statements.
- Health Insurance details - If your referral comes from a health insurance company, we will collect and store personal data such as referral information, authorisation for psychological services, number of sessions, contact information and health insurance policy number as given by your health insurance provider.
- Technical data which includes IP address, details about your browser, operating system, location and time zone settings, details on length of visit to pages on the website, page views, as well as other technology on the devices you use to access our website.
- User Data which refers to information about how you use our website.

We will also collect, store and use the following “special categories” of information about you. This includes:

- Information about your health, including any medical condition or disability. Health information is needed to understand if you require additional support.
- Therapy records: letters, outcome measures and/or reports.

We will use your personal information only to provide the high-quality psychological services you have requested, take payment for such services and to properly monitor, use and administer our website. If you do not agree to provide your personal information where we are required to collect personal information by law or under the terms of an agreement we have with you (e.g. to provide you with the service requested), we might not be able to offer you our services.

2. HOW WE COLLECT YOUR PERSONAL DATA

- **Directly provided by you**

Most of the personal information we process is provided to us directly by you – in person, through our therapy agreement form and any other relevant forms, via email, telephone and our website.

This includes personal information you provide when you request our psychological services.

- **Automatic collected data**

When you interact with our website, we may automatically collect User Data and Technical Data about your device, navigation paths and actions. We collect this data by using cookies and other similar technologies. Please read our [cookie policy](#).

- **Third Parties**

We may receive Technical Data about you from analytics providers such as Google.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data in the following situations:

- Where we need to perform a contract we have entered into with you or are about to enter into with you. Please note that a contract in the context of therapeutic services does not have to be written down or a formal signed document. Specifically, this relates to your request to engage in therapy services offered by us.
- Where it is necessary for our legitimate interests (or legitimate interests of a third party). In each circumstance where we process your personal data on the legitimate interests ground, we ensure that our legitimate interests do not override your fundamental rights and freedom.
- Where we need to comply with a regulatory or legal obligation.

Under certain circumstances, we will seek your consent, in writing (e.g. processing special categories data). However, normally we do not rely on consent as our lawful ground for processing your personal data.

Purposes for using your personal data

It is necessary to collect and use this information about you in order to provide effective and safe psychological therapy and to comply with legal obligations. Below you can find an illustration of all the ways we intend to use your personal information as well as the related legal bases we rely on in order to do so:

Purpose	Data type	Lawful ground for processing
To process your request for our psychological services	1. Personal Identity Data 2. Contact Data 3. Organisations/services/individuals that are supporting you such as your GP details. 4. Consent – Signed therapy agreement 5. Special Categories – Medical 6. Employment information	Performance of a contract
To contact you and manage our relationship with you	1. Personal Identity Data 2. Contact Data 3. Records of transaction data	Performance of a contract Legal obligation – accounting compliance
To use, monitor and administer this website and our Business	1. Technical Data	Necessary for our legitimate interest – running our business.
To improve our website, customers experience and services using analytic data	1. Technical Data 2. User Data	Necessary for our legitimate interests – to keep our website relevant and updated, to define types of clients for our services, to grow our business and inform our advertising strategy.

Cookies

You can turn off cookies from your browser. If you would like more information about the cookies we use on our website, please read our [cookie policy](#).

Change of Purpose

We will only use your personal information for the purpose for which we collected it, except in the event where we need to use it for another reason and this is compatible with the initial purpose. If for any reason we need to use your personal information for a purpose which is not related to the initial purpose, we will inform you and we will explain the lawful ground which enable us to do so, and of course you have the right to object to the new use of your personal information.

Please be aware that we may process your personal information without your knowledge or consent if this is permitted or required by law.

4. DISCLOSURE OF YOUR PERSONAL DATA

Any information about you and the therapy is confidential and therefore this information will not be normally disclosed to anyone else. However, in rare circumstances, we may have to share certain relevant information in order to provide support you have asked from us, for example:

- With your healthcare provider, such as your GP, in regard to your mental health if considered necessary and in your interest to do so, or if you ask us to contact them on your behalf to report concerns.
- We may disclose your personal information without your knowledge or consent if we have reason to believe this will help protect someone at risk/yourself, with relevant authorities, for example your GP, Emergency Services or the Police, or where this is required by law. Where possible and practical we will inform you at the time.
- To an individual you have given us consent to speak to, in relation to a particular matter or in an emergency.
- With a professional colleague, that could contact you in the event of an emergency or a serious illness, resulting in us not being able to attend the session.
- This website uses data processors systems such as Google Analytics advertising features, therefore a third party agent may have access to your IP address as well as other Technical Data for analytic data search purposes. Squarespace and Google Analytics/Ads have their own privacy policies in line with EU GDPR.
- If your referral comes from a health insurance company, we will share information about our scheduled appointments for billing purposes. Further, we may also need to share information on treatments progresses.

We require all third parties to treat your personal information in compliance with the law and to respect the security of such data. We only allow third parties to process your personal information for the specific purpose we requested from them and in compliance with our instructions. We do not permit any third party to use your personal information for their own purposes.

We do not broker or sell your personal data or share it with any third party organisations or anyone else.

5. DATA STORAGE AND DATA SECURITY

We take the security of the information you share with us very seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties that have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Further, the use of personal data in e-mail or phone communications will be minimised as much as possible, also reducing to a minimum the use of digitally stored files. Specifically:

- We will store this information securely in your personal folder- in paper form.
- Any sensitive data we may send to you or information about you that we may need to send to a third party (with your consent and in your interest) will be sent via e-mail as an attached password-protected document. E-mail applications use Secure Sockets Layer (SSL) as default security technology. This technology is used to encrypt e-mail traffic.
- Personal data that is stored in a digital file will be stored in a password protected computer, equipped with antivirus and malware protection, or on a mobile protected with a passcode.
- Analytical tracking systems such as Google Analytics take significant steps towards safeguarding data and to prevent unauthorized access, you can read more on their approach to data security and processing [here](#).

6. DATA RETENTION

How long will you use my personal information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected for, including for the purposes of satisfying any accounting, reporting or legal requirements.

To establish the appropriate retention time for your personal data, we take into account the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal information and whether we can achieve these through other means, and legal requirements.

We update the information (including Identity, Contacts and communication, Financial and Transaction Data) while we are in contact with you and keep it for a period of 7 years after your therapy work ends, for tax purposes. After this period, the data will be destroyed. Any data we collect as a result of an enquiry about therapy which does not result in us working with the client, will be deleted after a period of 6 months.

7. EXTERNAL WEBSITES

This website may include links to third party external websites. While we make every effort to ensure to control their content and security, we are not responsible for their approach to data protection and therefore we cannot accept any liability in regard to the security or content of external third parties websites.

8. YOUR RIGHTS ON YOUR PERSONAL DATA

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of the personal information we hold about you.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. Specifically, this will enable you to ask us to delete personal information where there is not significant reason for us to continue processing it. Please note that we may not be able to satisfy your request for erasure for legal or accounting reasons that we will make clear to you, if applicable, when you make a request.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances. Specifically, if we rely on a legitimate interest and you want to object to processing on this basis as you believe it impacts on your fundamental rights and freedoms.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

Your right to withdraw consent - You can withdraw your consent at any time where we rely on consent to process your personal information. If you decide to withdraw your consent, we may not be able to provide our services to you. If applicable, we will notify you when you make your request to withdraw your consent.

You are not required to pay any charge for exercising your rights. If you make a request, we will satisfy your request within one month. Please contact us at info@drnormascevoli.co.uk or 07519298296 if you wish to make a request.

We will ask you to send a written request and we may ask you to provide further evidence in order to confirm your identity.