



Psychological Pathways

Psychological Pathways Data Management and Privacy Policy

Effective Date: 1st November 2023

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1. Introduction

Psychological Pathways takes the privacy rights of all its clients seriously and adopts a high standard of compliance and confidentiality when dealing with your data.

This Data Management and Privacy Policy outlines how we collect, use, retire and protect your data when you interact with our products and services. This includes any data you may provide through this website when you purchase our services, any products or sign up to our newsletter. You may also choose to complete any questionnaires post availing of our services or subsequent marketing campaigns.

Psychological Pathways are a data controller under the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (referred to as “we”, “us” or “our” within this data management policy). We are the controller of your personal data as we decide what information to collect about you and what we will use it for, in order to discharge our statutory responsibilities and to provide services to you.

We only use your personal data to provide services to you and as required by law. We are permitted to do so under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 (UK), Law Enforcement Directive & Irish ePrivacy Regulations 2011 (ROI) generally because the legislation under which we operate permits or requires us to process your personal data in order to promote the development, welfare and protection of adults, children and families or, in other words, because:

- the processing is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority vested in us;
- the processing of your personal data is necessary for compliance with legal obligations

2. Responsibilities

We have appointed safeguarding officers who are responsible for overseeing questions in relation to this policy. If you have any questions, including any requests to exercise your legal rights, please contact us using the details set out below.

Full name of legal entity: Psychological Pathways

Email address: carmel@psychologicalpathways.com lisa@psychologicalpathways.com

Postal address: City East Business Centre, Newtownards Rd, Belfast, BT4 1GW

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

We would however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We may update this policy from time to time to reflect changes in our data practices following inhouse process or external legislation changes. This version was last updated in November 2023.

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

3. Information We Collect

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 (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type 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.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this policy.

- **Sensitive Data** includes information about your health, including information about your existing and previous medical conditions, medication details, psychiatric history

and any other relevant health information to enable us to carry out our services to you. We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

How is your personal data collected

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

- **Direct interactions** You may give us your Identity, Contact and Financial Data by filling in forms before or during an appointment, verbally during discussions at our practice, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services or any of our products;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.

Automated technologies or interactions

Technical Usage Information, Cookies & Tracking Technologies: We may collect data on how you interact with our website, products, and services. We use cookies and similar technologies to enhance your experience and analyse user behaviour. These analytics are for the purpose of continuous improvement of our processes and practices.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Third parties or publicly available sources

We will receive personal data about you from various third parties and public sources as set out below; Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Facebook based outside the EU; and
- search information providers such as Google based outside the EU.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Stripe, Square or PayPal based outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or goods). In this case, we may have to cancel a service or product you have with us but we will notify you if this is the case at the time.

4. How We Use Your Information

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent when collecting sensitive data (such as health information) and before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We use your data for the following purposes:

- Delivering our services as contracted
- Processing transactions and payments
- Communicating with you about updates, promotions and customer support/satisfaction
- Analysing usage patterns and improving our website and services

We have set out below, in table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
<i>To provide our services and to process and deliver any orders including:</i> (a) provide our services to you (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Sensitive Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Explicit consent (in the case of Sensitive Data)
<i>To manage our relationship with you which will include:</i> (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers 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 goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

5. Marketing

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

6. Data Sharing

We share personal data only to the extent that this sharing is strictly necessary with relevant third parties for the purposes of notifying them of child/adult protection concerns, mandated persons for the purposes of obtaining their assistance with assessing child/adult protection concerns, An Garda Síochána/PSNI for the purposes of reporting a crime or suspected crime, or where required by law.

We may share your personal data with health care and education providers, medical, legal or educational professionals and the third parties referred to in this notice where we consider it in your best interest to do so.

7. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. International transfers

We may transfer your data outside the European Economic Area (EEA). Some providers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. How We Keep Your Personal Data Secure

Psychological Pathways employs industry-standard security measures to protect your data from unauthorised access or disclosure. We have technical, administrative, and physical security measures in place to protect your personal data from unauthorised access and improper use.

Psychological Pathways deliver our services using a suite of products. We operate using a Google Platform; one of the worlds most secure and reliable cloud infrastructures with built-in security features that automatically detects online threats. Google supports GDPR compliance efforts in relation to processing of customer personal data. Our customer management systems are password protected and/or require 2-factor authentication for access. We use Write-Upp for managing our clinical work - more information available www.writeupp.com/security

All documents stored or shared to third parties are also password protected. All information is shredded once uploaded to our secure systems and/or stored within locked cabinets or code combination secure lock boxes.

Data security

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

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

Data retention & how long we will keep your data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint, a safeguarding issue or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

Our retention periods take into account legal obligation(s) under applicable law to retain data for a certain period of time, statute of limitations under applicable law and regulatory guidance.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table 'Purposes for which we will use your personal data' above.

- Service providers, acting as processors who provide IT and system administration services.
- Professional advisers, acting as processors or joint controllers, including healthcare professionals, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities, acting as processors or joint controllers, based who require reporting of processing activities in certain circumstances.
- Third party software which meets UK GDPR standards for data security. This includes accountancy software, practice management software and email management services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We 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 our instructions.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

10. Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on 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, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

We do not sell your personal information to third parties. However, we may share your data with:

- Service Providers: We may use trusted third-party providers to assist in business operations.
- Legal Requirements: We may disclose your information when required by law or to protect our rights and the safety of others

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Children's Privacy

Our services do include the assessment of and the provisioning of an outcomes report for minors. We therefore collect personal data relating to the child to support assessment planning and outcomes, however we will always have a parent/guardian present when assessing the child. Consent will be provided from the parent/guardian.

12. Contact Us

If you have any questions or concerns about this policy or your data, please contact us at admin@psychologicalpathways.com