

#### Website Privacy Policy

#### 1. Introduction

This privacy notice provides you with details of how we collect and process your personal data through your use of our site [www.charliefancy.co.uk]

Charlie Fancy is the data controller, and I am responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice.

#### **Contact Details**

My full details are:	Charlie Fancy trading as Charlie Fancy Therapy
Email address:	charlie@charliefancy.co.uk
Postal Address:	3 Paris, Parklands, Railton Road, Guildford. Surrey. GU2 9JX

It is very important that the information we have about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at <u>charlie@charliefancy.co.uk</u>

#### 2. What data do we collect about you, for what purpose and on what ground do we process it

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

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- Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- Customer Data that includes data relating to any purchases of services such as your name, title, email address, and telephone number. We process this data to contact you to then supply services to you and to keep records of such interactions. Our lawful ground for this processing is to take steps at your request to enter into a contract between you and us.
- User Data that includes data about how you use our website. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our

business.

- Technical Data that includes your use of our website and online services, which may include
  - Your IP address
  - Browser type and version
  - Length of visit to pages on our website
  - Page views and navigation paths
  - Time zone settings
  - Other technology on devices used to access our website

This data is sourced from our analytics tracking system and is processed to

- Analyse the use of our website
- Administer and protect our business and website
- Deliver relevant content and advertisements
- Understand advertising effectiveness

Our lawful basis for processing this data is legitimate interests which helps us to effectively administer our website and grow our business.

- Marketing Data that includes data about your preferences in receiving marketing from us and your communication preferences. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
- Sensitive Data Disclosure

When you complete our contact form, you may choose to share personal information, including potentially sensitive data in the message box. We encourage you to refrain from sharing any sensitive or personal information unless it is necessary for your enquiry.

- Use of Information: The information you provide through this form will be used solely for the purpose of responding to your inquiry and will be processed in accordance with data protection laws. We are committed to ensuring that your personal data is handled securely and confidentially.
- Explicit Consent: By submitting this form, you explicitly consent to the processing of any sensitive data you may provide. We will ensure that this data is protected and only used in ways that comply with your rights under data protection laws.
- Data Protection: We take the privacy and security of your data seriously. All personal information collected will be stored securely and will only be accessible to authorised personnel who are bound by confidentiality obligations.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at <u>charlie@charliefancy.co.uk</u>. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## 3. Marketing Communications

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 asked for information from us about our services or (ii) you agreed to receive marketing communications and in each case, you have not opted out of receiving such communications since.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at charlie@charliefancy.co.uk at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of therapy services.

# 4. Disclosures of Personal Data

We may share your personal data with the parties set out below:

- Administrative Support personnel who assist us in managing our business operations
- IT service providers, such as Xero for accounting, Drobox for file storage and Cliniko for client management.
- Professional advisors, including our clinical supervisor for oversight of therapy practices, auditors for financial compliance, and banks for managing transactions
- Government bodies if required to comply with legal obligations or to respond to lawful requests for information.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

# 5. International transfers

We may transfer your personal data (including your name, address, and email address) to third-party service providers, such as Xero, which processes data in the United States. As the US does not provide the same level of data protection as the UK, we ensure that appropriate safeguards, including Standard Contractual Clauses, are in place to protect your data. By providing your data, you consent to these international transfers. You have the right to request further information about how your data is protected during these transfers

## 6. Data Security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.

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

## 7. Data Retention

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

When deciding what the correct time is to keep the data for, we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

# 8. Your Legal Rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:



If you wish to exercise any of the rights set out above, please email us at charlie@charliefancy.co.uk

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 or refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (*www.ico.org.uk*). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

#### 9. 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 notice of every website you visit.

## 10. Cookies

This website uses session cookies to enhance your experience. These cookies are temporary and are deleted once you close your browser. They are essential for the functionality of the site, such as maintaining your session while you navigate. No consent is required for these cookies as they are necessary for the website to operate. For further information please see my Cookie Policy:

