

## GENERAL DATA PROTECTION POLICY (PRIVACY POLICY)

This privacy policy applies between you, the User of this Website, and Palmer and Palmer Psychology Ltd, the owner and provider of this Website. Palmer and Palmer Psychology Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any, and all Data collected by us or provided by you in relation to your use of the Website and all other technologies (e.g., email, telephone, video conference software, and so on).

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found at: [www.papps.org.uk](http://www.papps.org.uk).

**Please read this policy carefully.**

### Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to Palmer and Palmer Psychology Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws.
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> ).
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations, and secondary legislation.
<b>GDPR</b>	the UK General Data Protection Regulation.
<b>Palmer and Palmer Psychology Ltd, we or us</b>	Palmer and Palmer Psychology Ltd, a company incorporated in England and Wales with registered number 14602051 whose registered office is at 54 Thorpe Road, Norwich, Norfolk, NR1 1RY.
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and

	Electronic Communications (EC Directive) (Amendment) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2018.
<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by Palmer and Palmer Psychology Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Palmer and Palmer Psychology Ltd and accessing the Website in connection with the provision of such services.
<b>Website</b>	the website that you are currently using, <a href="http://www.papps.org.uk">www.papps.org.uk</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this policy, unless the context requires a different interpretation:
- a. the singular includes the plural and vice versa;
  - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
  - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d. "including" is understood to mean "including without limitation";
  - e. reference to any statutory provision includes any modification or amendment of it;
  - f. the headings and sub-headings do not form part of this privacy policy.

### Scope of this privacy policy

3. This policy applies only to the actions of Palmer and Palmer Psychology Ltd and Users with respect to this Website and all other technologies by which we may connect, including but not limited to email, telephone, and video conferencing software. It does not extend to any websites or communication tools that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

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4. This policy applies to all personal and business data we collect, store, and process to provide you with our services and, where applicable, in line with relevant ethical and legal obligations (e.g., please see our Terms and Conditions and Safeguarding Policy).
5. For purposes of the applicable Data Protection Laws, Palmer and Palmer Psychology Ltd is the "data controller". This means that Palmer and Palmer Psychology Ltd determines the purposes for which, and the way your Data is processed.

### **Data collected**

6. We may collect the following Data, which includes personal Data, from you:
  - a. name;
  - b. date of birth;
  - c. gender;
  - d. contact information such as home address, email addresses and telephone numbers;
  - e. demographic information such as postcode, preferences and interests;
  - f. IP address (automatically collected);
  - g. web browser type and version (automatically collected);
  - h. operating system (automatically collected);
  - i. Sensitive data (e.g., history of mental health treatment, special educational needs, and similar).

In each case, in accordance with this and associated policies.

### **How we collect Data**

7. We collect Data in the following ways:
  - a. data is given to us by you; and

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b. data is collected automatically.

### **Data that is given to us by you**

8. Palmer and Palmer Psychology Ltd will collect your Data in several ways, for example:

- a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
- b. when you register with us and set up an account to receive our products/services;
- c. when you make payments to us, through this Website or otherwise;
- d. when you elect to receive marketing communications from us;
- e. when you use our services.

In each case, in accordance with this policy.

### **Data that is collected automatically**

9. To the extent that you interact with us, including but not limited to point 8, we will collect your Data automatically, for example:

- a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times, and frequency with which you access the Website and the way you use and interact with its content.
- b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see our Cookies Policy at [www.papps.org.uk](http://www.papps.org.uk) which is covered, in brief, below.

### **Our use of Data**

10. Any or all the above Data may be required by us from time to time in order to provide you with the best possible service and experience. Specifically, Data may be used by us for the following reasons:

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- a. internal record keeping;
- b. to deliver effective, efficient, and safe services;
- c. improvement of our products / services;
- d. transmission by email of marketing materials that may be of interest to you.

In each case, in accordance with this policy.

11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
12. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
  - a. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular service, and we are marketing similar services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out;
  - b. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide;
  - c. if you are not satisfied with our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
13. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract. This contract is outlined in our Terms and Conditions which you are asked to read and agree to before our work commences.

## Who we share Data with

14. We may share your Data with the following groups of people for the following reasons:

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- a. our employees, agents and/or professional advisors - to deliver a safe and effective service;
- b. third party payment providers who process payments made over the Website or in-person, or by any other means available now and in the future - to enable third party payment providers to process user payments and refunds;
- c. relevant authorities - to fulfil our legal responsibilities such as safeguarding children, young people, and vulnerable adults; we may also share information with professionals you give us permission to speak with or if we are required to by law or professional bodies (e.g., HCPC, BPS, AEP, and similar).

In each case, in accordance with this policy.

### Keeping Data secure

15. We will use technical and organisational measures to safeguard your Data, for example:
  - a. access to your account is controlled by a password and a username that is unique to you.
  - b. we store your Data on secure servers. These are operated and maintained by our trusted agent, Nu Image ([www.nuimage.co.uk](http://www.nuimage.co.uk)).
  - c. We have Data Control Agreements in place with our contracted agents. This includes, for example, business support and content managers. Our business support is provided by Patience Moore of [Norfolk Virtual PA](#). We may, from time to time, have similar agreements in place with other individuals or organisations with whom we have a business relationship to deliver effective and efficient services to you.
16. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [npalmer@papps.org.uk](mailto:npalmer@papps.org.uk).
17. Detailed information about staying safe and protecting your online data can be obtained from [Get Safe Online](#). This organisation provides useful ideas on how to protect your information and your computers and devices against

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fraud, identity theft, viruses, and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## Data retention

18. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted. This will be as follows:
  - a. For **those we work with**, this period is **10 years from the date we finished our work together**.
  - b. For **those making a general enquiry**, this period is for a **maximum of 28 days**. If we have not received confirmation that you would like to proceed with using our services, your data will be deleted within this period. This means we will keep your data for **up to 28 days** but may delete it sooner.
  - c. For **those submitting a referral but who have not confirmed our work together** (e.g., by paying the appropriate invoice), this period is for a **maximum of 28 days**. We will make **at least one attempt** to contact you within this time to confirm whether you wish to proceed. **We will not hold a referral open beyond 28 days, even if you request us to**. This means, if you wish to work with us in the future and the 28 days have lapsed, you will be required to submit a new referral form.
  - d. If you **agree to marketing**, your information will be **kept for that purpose until you tell us otherwise**. We will contact you periodically to ensure you still wish to be on the marketing list and that your details are correct.
19. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

20. You have the following rights in relation to your Data:
  - a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update, or delete

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such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
  - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy, or transfer your Data.
  - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
21. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [npalmer@papps.org.uk](mailto:npalmer@papps.org.uk).
22. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>. We are registered with the ICO with reference number: **ZB511845**.
23. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

### Links to other websites

24. Our Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use



of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

### **Changes of business ownership and control**

25. Palmer and Palmer Psychology Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Palmer and Palmer Psychology Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
26. We may also disclose Data to a prospective purchaser of our business or any part of it.
27. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

### **Cookies**

28. Our Website may place and access certain Cookies on your computer. Palmer and Palmer Psychology Ltd uses Cookies to improve your experience of using the Website and to improve our range of services. Palmer and Palmer Psychology Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and always respected.
29. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
30. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Palmer and Palmer Psychology Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
31. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). By using the Website, you agree to our placement of functionality cookie.

32. You can choose to enable or disable cookies in your internet browser. By default, most internet browsers accept cookies, but this can be changed. For further details, please see the help menu in your internet browser. You can switch off cookies at any time, however, you may lose any information that enables you to access the Website more quickly and efficiently.
33. You can choose to delete cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
34. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
35. For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](https://www.aboutcookies.org). You will also find details on how to delete cookies from your computer.

## General

36. You may not transfer any of your rights under this policy to any other person. We may transfer our rights under this policy where we reasonably believe your rights will not be affected.
37. If any court or competent authority finds that any provision of this policy (or part of any provision) is invalid, illegal, or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
38. Unless otherwise agreed, no delay, act, or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
39. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

## Our agents

40. To operate a safe, effective, and compliant service, we work with several third-party agencies. These include our accountants, insurers, lawyers, design, marketing, business support, and technical teams, amongst others. In some cases, your personal data will be shared or otherwise accessible to our trusted third parties. For example, if we issue you an invoice, we are required to provide these to our accountant or if you submit a query or referral through our website ([www.papps.org.uk](http://www.papps.org.uk)) this is stored on a secure server which is accessible by our design agents, Nu Image ([www.nuimage.co.uk](http://www.nuimage.co.uk)).

## Changes to this privacy policy

41. Palmer and Palmer Psychology Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the policy on your first use of the Website following the alterations. You may contact Palmer and Palmer Psychology Ltd by email at [npalmer@papps.org.uk](mailto:npalmer@papps.org.uk).