

## **DATA PRIVACY POLICY**

This is the privacy notice of Tebogo Mothoa Therapy. In this document, "we", "our", or "us" refer to Tebogo Mothoa Therapy.

Tebogo Mothoa Therapy acknowledges that your privacy is especially important and, as such, takes care to maintain client confidentiality. I am registered with the ICO (Information Commissioners Office) which means I need to tell you what data I am collecting from you and what I intend to do with it. These guidelines serve to protect your confidential material and ensure the integrity and professionalism of your therapist.

### **Introduction**

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all our clients and visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).

6. The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

### **The bases on which we process information about you**

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

#### **1. Information we process because we have a contract with you**

When you become our client, a contract is formed between you and us.

The service we provide to you as a client necessarily entails you providing us with personal information.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

Additionally, we may aggregate this information generally use it to provide class information, for example to monitor the performance of a particular service we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## **2. Information we process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you write to us requesting a response.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by writing to us at our registered office or by e-mail at [e-mail address]. If you do so, we shall not be able to provide our services further.

## **3. Information we process for the purposes of legitimate interests**

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether we could achieve the same objective by other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business
- protecting and asserting your rights, our rights, or the rights of any other third party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

#### **4. Information we process because we have a legal obligation**

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

**I would of course try to discuss and disclosures beforehand with you to obtain your consent but there may be times this is not possible.**

## **Specific uses of information you provide to us**

### **5. Information relating to your method of payment**

Your debit or credit card number and other payment information is never taken by us or transferred to us either through our website or otherwise.

### **6. Contacting us**

When you contact us, whether by telephone, by post, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We may keep personally identifiable information associated with your message, such as your name and email address to be able to track our communications with you to provide a high-quality service.

## **Use of information we collect through automated systems when you visit our website**

### **7. Cookies**

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

#### **8. Secure Storage**

We store client information on a secure encrypted platform which is designed specifically for therapist. Our account is password protected and known only to ourselves. This secure storage platform is accessed via my laptop which is password protected and has anti-virus systems installed.

#### **9. Confidentiality**

We keep all client data confidential and discussions during therapy sessions are subject to the same confidentiality. If your sessions are paid for or arranged via a third party, e.g. a friend, partner, spouse or family member, nothing other than payment requests, invoices or receipts your counselling information will be shared.

If your sessions are paid for or arranged via your employer, company, charity or organisation the only information that will be shared is payment requests, invoices, receipts and confirmation that your counselling sessions are taking place.

#### **10. How long is your information retained for?**

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

10.1. to provide you with the services you have requested;

- 10.2. to comply with other law, including for the period demanded by our tax authorities;
- 10.3. to support a claim or defence in court.

## **Your rights in relation to your personal data**

### **11. Access to your personal information**

- 11.1. At any time, you may review or update or request that we remove personally identifiable information that we hold about you. To obtain a copy of any information that is not provided on our website you may send us a request at [email address].
- 11.2. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.
- 11.3. When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

### **12. How you can complain about our privacy policy**

- 12.1. If you are not happy with our privacy policy or if you have any complaint with respect to how we process your personal information then you should tell us by email. Our address is [email address].
- 12.2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 12.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

**13. Compliance with the law**

Our privacy policy has been compiled so as to comply with the laws of the legal jurisdictions in the UK and the European Union. If you think it fails to satisfy any of these laws, we should like to hear from you.

**14. Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at [tebogo.mothoa@satorihealthcentre.com](mailto:tebogo.mothoa@satorihealthcentre.com).