

**Website Privacy Notice for:**

**mindful steps counselling and psychotherapy**

Websites : [www.mindfulsteps.co.uk](http://www.mindfulsteps.co.uk) and / or [www.mindfulsteps.com](http://www.mindfulsteps.com)



## **Website Privacy Notice**

This is the privacy notice of *mindful steps counselling and psychotherapy*. In this document, "we", "our", or "us" refer to *mindful steps counselling and psychotherapy*.

### **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 regards 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.

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 [mindfulsteps@live.co.uk](mailto:mindfulsteps@live.co.uk).

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.

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

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

Payment methods include Cash, Cheque, PayPal, BACS and Credit/Debit card.

We do not store information about your debit or credit card or other means of payment.

Credit / Debit card transactions are handled using a certified third party mobile transaction resource such as SumUp. This service connects via Bluetooth to the providers secure mobile App (via Android or Apple smartphone or tablet).

PayPal payments are made via the 'PayPal.me' facility following the link: [paypal.me/mindfulsteps](https://paypal.me/mindfulsteps)

### ~~**6. Payments by Direct Debit**~~

~~If you pay us by Direct Debit, the information you give to us is passed to our own bank for processing according to our instructions. We [\[do / do not\]](#) keep a copy.~~

~~We keep this information only for the duration of the Direct Debit arrangement.~~

~~We are registered under the Direct Debit guarantee scheme. This provides for the customer's bank to refund disputed payments without question, pending further investigation. Direct Debits can only be set up for payments to beneficiaries that are approved originators. In order to be approved, these beneficiaries are subjected to careful vetting procedures. Once approved, they are required to give indemnity guarantees through their banks.~~

## **7. Job application and employment**

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

## **8. 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 so as to be able to track our communications with you to provide a high quality service.

## **9. Complaining**

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in

your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If you complain about any of the content on our website or in any brochure, we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it.

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

### **10. 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 of time, 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.

We use cookies in the following ways:

- 10.1. to track how you use our website
- 10.2. to record whether you have seen specific messages we display on our website
- 10.3. to keep you signed in our site
- 10.4. to record your answers to surveys and questionnaires on our site while you complete them
- 10.5. to record the conversation thread during a live chat with our support team

## **11. Personal identifiers from your browsing activity**

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.



## **Disclosure and sharing of your information**

### **12. Information we obtain from third parties**

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

[No such information is personally identifiable to you.](#)

### **13. Credit reference**

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.

### **14. Hyperlinks**

Any link (including a hyperlink, button or referral device of any kind) used in the Service is provided for your use and convenience. The appearance of a link does not constitute an endorsement, recommendation or certification by us, nor should the presence of a link in any way be construed as a suggestion that any third party website has any relationship to mindful steps counselling & psychotherapy.

We do not endorse the content on any third-party websites. We are not responsible for the content of linked third-party websites or third-party advertisements, and do not make any representations regarding its content or accuracy. We do not knowingly link to websites that may infringe on valid and existing trademarks, service marks, copyrights or patents. Your use of third-party websites is at your own risk and subject to the terms and conditions of use for such websites. Access to your own information

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

15.1. 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 [mindfulsteps@live.co.uk](mailto:mindfulsteps@live.co.uk).

- 15.2. 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.
- 15.3. 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.

## Other matters

### 16. How you can complain about our privacy policy

- 16.1. 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 [mindfulsteps@live.co.uk](mailto:mindfulsteps@live.co.uk).
- 16.2. 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.
- 16.3. 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/>

### 17. Retention period for personal data

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

- 17.1. to provide you with the services you have requested;
- 17.2. to comply with other law, including for the period demanded by our tax authorities;
- 17.3. to support a claim or defence in court.

## **18. 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.

## **19. 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.