



GDPR Privacy Notice

This notice explains how information about you is used. Tilehouse Counselling will be the data controller and can be contacted as follows: by post: Kim Kirby, Data Protection Manager, Tilehouse Counselling, Coach House, R/O 84 Tilehouse Street, Hitchin, SG5 2DY; By e-mail: counselling@tilehouse.org; and by phone: 01462 440674

The information we gather - Tilehouse Counselling gathers certain information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and the Data Protection Act 2018 and we are responsible for that personal information for the purposes of those laws. In this notice, references to 'we' or 'us' means Tilehouse Counselling.

Information that we gather about you may include without limitation your name, contact details, date of birth, enquiry form details, client files and GP details, and marketing details. We may also obtain information about you from third parties, such as our group companies, service providers and agents. The provision of information by you is entirely voluntary. If you do not provide your information it may not be possible for us to provide our services. Information we process as described in this notice may also include information about third parties whose details you supply to us.

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach which entails reporting the breach to the ICO immediately in the unlikely situation that this occurs. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

The legal basis and reasons for processing - This privacy notice sets out how we will process your data. Processing can take place when it is necessary to perform a contract between us, or where we are both taking steps to enter into a contract. It can also take place based on our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. Our legitimate interests may be that we are carrying or may carry on business with your employer. There is a limited privacy impact on you, and we think that you will expect that we will process your data in this way. Sometimes processing will take place based on your consent, such as when you give us your clear and express permission to do something with your personal data. Whenever you have given consent you can withdraw it at any time. If you have entrusted us with any medical information about you, the processing will take place based on your informed consent. Where you have given consent to any data processing, you have the right to withdraw that consent at any time. We process information about you for the following reasons:

What we use your information for	Our reasons
To provide our services	For the performance of our contract with you or to take steps at your request before entering into a contract, and with your consent when it concerns counselling
Providing customer services, analysing preferences and improving services	For the performance of our contract with you, for our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you, and to comply with our legal and regulatory obligations
To improve user experience	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you
Operational reasons, such as recording transactions, training and quality control, and ensuring business policies are adhered to	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you
Conducting checks to identify people and verify their identity, screening for financial and other sanctions or embargoes, and other processing necessary to comply with professional, legal and regulatory obligations, corporate governance obligations and good practice that apply to our business, e.g. under health and safety regulation or rules issued by our professional regulator	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you, and to comply with our legal obligations
Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests	To comply with our legal and regulatory obligations
Security vetting, preventing fraud, investigating claims, complaints and allegations of criminal offences	For our legitimate interests or those of a third party, i.e. to minimize fraud that could be damaging for us and for you, and to comply with our legal obligations
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information, and to comply with our legal and regulatory obligations

Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you, and to comply with our legal and regulatory obligations
Updating and enhancing client records	For the performance of our contract with you or to take steps at your request before entering into a contract, to comply with our legal and regulatory obligations, and for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our clients
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations, and for our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standard, and to comply with our legal and regulatory obligations
Marketing our business and those of our group	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former contacts

Promotional communications - We may use your personal information to send you updates (by email, text message, telephone or post) about our services and fundraising, including new services. We have a legitimate interest in processing your personal information for promotional purposes (see above). Where consent is needed, we will ask for this consent separately and clearly. We will always treat your personal information with the utmost respect and never share it with other organisations outside our group for marketing purposes. You have the right to opt out of receiving promotional communications at any time by contacting our Data Protection Manager. We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Systems used to process data - We gather information directly from you and also via our websites and other technical systems. These may include, for example, our: computer networks and connections; communications systems; email and instant messaging systems; intranet and Internet facilities; and telephones, voicemail, mobile phone records.

Disclosure - We will only ever disclose any client personal data with the client's unambiguous and informed consent, unless there is a risk of serious harm to the client.

For marketing, fund raising or other similar services, we may disclose and exchange information with our group companies, service providers, representatives and agents, as well as with law enforcement agencies and regulatory bodies for the above reasons. We only share information with such service providers if we are happy that they take appropriate measures to protect your personal information. Information may be held at our offices and those of our group companies, and service providers, representatives and agents as described above.

Retention periods - Generally, we will retain personal data only for as long as it is accurate, relevant and useful to us. All data regarding counselling will be stored securely for six years from the date that the client finishes counselling.

Your rights - You have a number of important rights, which can be exercised free of charge. You have the right to request:

- access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal information concerning you in certain situations
- receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal information concerning you for direct marketing
- object in certain other situations to our continued processing of your personal information
- otherwise restrict our processing of your personal information in certain circumstances.

Where you have given consent to any data processing, you have the right to withdraw that consent at any time. We will not do anything with your data not outlined in this notice. For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation. If you would like to exercise any of these rights, please contact our Data Protection Manager in writing (see above), providing enough information to identify you and let us know which information to which your request relates. If you are not satisfied with any complaint you have with us, you also have the right to make a complaint to the Information Commissioners Office, which is the supervising authority in the UK in relation to data processing. You can contact the Information Commissioner at ico.org.uk/concerns/ or by telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint. We may change this privacy notice from time to time. Changes will be displayed on our website. This notice was last updated in September 2019.