Privacy Policy

This Privacy Policy (“**Policy**”) relates to my Website at <http://www.looking-glasscounselling.co.uk> and all related downloadable software and other services provided by me at Looking-Glass Counselling and in or on which a link to this Privacy Policy is displayed, and all other communications with individuals by written or oral means, such as email, Skype video call, text or phone conversations (collectively, together with the Website, (my **“Service”).**

This Policy describes the information that I gather on or through the Service, how I use and disclose this information, and the steps I take to protect this information. By visiting the Website, purchasing or using any Services provided by me, you consent to the privacy practices described in this Policy.

This Policy is incorporated into, and is subject to, my Counselling Contract. Capitalised terms used but not defined in this Policy have the meaning given to them in The Counselling Contract.

**Definitions**

**“Client”** means the individual participating in counselling sessions at Looking-Glass Counselling, who has a right to confidentiality in accordance with the Ethical Framework of the BACP and the Privacy Policy.

**“Customer”** means the individual making payment for services provided by me at Looking-Glass Counselling. (The client is often also the customer, but not always.)

**“Client Data“** means personal data, addresses, phone numbers, session notes and any other information provided to me by a Service User.

**“Personal Data”** means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

**“Public Area”** means the area of the Site that can be accessed both by Users and Visitors, without needing to use a login ID and a password.

**“Restricted Area”** means the area of the Site that can be accessed only by Users, and where access requires the use of a login ID and a password.

**“User”** means a Client, customer, or representative of a Client, who primarily uses the restricted areas of the Site for the purpose of accessing the Service in such capacity.

**“Visitor”** means an individual other than a User, who uses the public area, but has no access to the restricted areas of the Site or Service.

**The Information I Collect on the Service:**

I collect different types of information from or through the Service:

**User-provided Information**. When you use the Service, as a Client, a Customer or as a Visitor, you may provide, and I may collect Personal Data. Examples of Personal Data include name, email address, mailing address, mobile phone number, and credit card or other billing information. Personal Data also includes other information that identifies a specific individual. You may provide me with Personal Data in various ways. For example, when you sign the Counselling Contract, when you disclose personal information verbally during the counselling sessions or via other forms of communication, such as email, text or over the phone, when you fill out the Contact form on the Website and when you message me via the various directories in which I am listed, including, but not limited to the BACP Accredited Register, or Find a Therapist directory, and The Counselling Directory.

**“Automatically Collected" Information**. When a User or Visitor uses the Service, certain information may be automatically recorded from the User’s or Visitor’s device by using various types of technology, including cookies, “clear gifs" or “Ib beacons.” This “automatically collected" information may include IP address or other device address or ID, Ib browser and/or device type, the Ib pages or sites visited just before or just after using the Service, the pages or other content the User or Visitor views or interacts with on the Service, and the dates and times of the visit, access, or use of the Service. these technologies may also be used to collect information regarding a Visitor or User’s interaction with email messages, such as whether the Visitor or User opens, clicks on, or forwards a message. This information is gathered from all Users and Visitors.

* + - 1. **[Integrated Services**. You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each, an “Integrated Service”), such as through the use of your Google account, or otherwise have the option to authorise an Integrated Service to provide Personal Data or other information to me. By authorising me to connect with an Integrated Service, you authorise me to access and store your name, phone number(s), email address(es), and other information that the Integrated Service makes available to me, and to use and disclose it in accordance with this Policy. You should check your privacy settings on each Integrated Service to understand what information that Integrated Service makes available to me, and make changes as appropriate. Please review each Integrated Service’s terms of use and privacy policies carefully before using their services and connecting to our Service.]

**Information from Other Sources**.

I may obtain information, including Personal Data, from third parties and sources other than the Service. If I combine or associate information from other sources with Personal Data that I collect through the Service, I will treat the combined information as Personal Data in accordance with this Policy.

**How I Use the Information I Collect**

I use the information that I collect in a variety of ways in providing the Service and operating our business, including the following:

**Operations**

I use the information – other than Client Data - to operate, maintain, enhance and provide all features of the Service, to provide the services and information that you request, to respond to comments and questions and to provide support to users of the Service. I process Client Data solely in accordance with the directions provided by the applicable Client or User.

**Improvements**

I use the information – other than Client Data - to understand and analyze the usage trends and preferences of my Visitors and Users, to improve the Service, and to develop new products, services, features, and functionality.

**Communications**

I may use a Visitor’s or User’s email address or other information – other than Client Data – to contact that Visitor or User (i) for administrative purposes such as customer service, to address intellectual property infringement, right of privacy violations or other issues related to the Client Data or Personal Data posted on the Service or (ii) with updates on promotions and events, relating to services offered by me and by third parties I work with. You have the ability to opt-out of receiving any promotional communications as described below under **“Your Choices.”**

**Cookies and Tracking Technologies**

“Cookies” are text-only pieces of information that a Website transfers to an individual’s hard drive or other Website-browsing equipment for record-keeping purposes. Cookies allow the Website to remember important information that will make your use of the Website more convenient.

**To Whom I Disclose Information**

Except as described in this Policy, I will not intentionally disclose the Personal Data or Client Data that I collect or store on the Service to third parties without the consent of the applicable Visitor, Customer or Client. I may disclose information to third parties if you consent to me doing so, as well as in the following circumstances:

Unrestricted Information

Any information that you voluntarily choose to include in a Public Area of the Service will be available to any Visitor or User who has access to that content.

**Service Providers**

I work with third party service providers who provide Website, application development, hosting, maintenance, and other services for me. These third parties may have access to, or process Personal Data or Client Data as part of providing those services for me. I limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions, and our contracts with them require them to maintain the confidentiality of such information.

**Non Personally Identifiable Information**

I may make certain automatically-collected, aggregated, or otherwise non-personally-identifiable information available to third parties for various purposes, including (i) compliance with various reporting obligations; (ii) for business or marketing purposes; or (iii) to assist such parties in understanding our Clients’, Users’ and Visitors’ interests, habits, and usage patterns for certain programs, content, services, and/or functionality available through the Service.

Law Enforcement, Legal Process and Compliance

I may disclose Personal Data or other information if required to do so by law or in the good-faith belief that such action is necessary to comply with applicable laws, in response to a court order, judicial or other government subpoena or warrant, or to otherwise cooperate with law enforcement or other governmental agencies.

I also reserve the right to disclose Personal Data or other information that I believe, in good faith, is appropriate or necessary to (i) take precautions against liability, (ii) protect myself or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend myslef against any third-party claims or allegations, (iv) protect the security or integrity of the Service and any facilities or equipment used to make the Service available, or (v) protect my property or other legal rights, enforce my contracts, or protect the rights, property, or safety of others.

**Your Options - Access, Correction, Deletion**

I respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. If you wish to access or amend any other Personal Data I hold about you, or to request that I delete any information about you that I have obtained from an Integrated Service, you may contact me as set forth in the “How to Contact Me” section. At your request, I will have any reference to you deleted or blocked in our database.

You may update, correct, or delete your personal information and preferences at any time by contacting me at victoria@looking-glasscounselling.co.uk. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, I may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where I otherwise reasonably believe that I have a legitimate reason to do so.

You may decline to share certain Personal Data with me, in which case I may not be able to provide to you some of the features and functionality of the Service.

At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by applicable law.

This provision does not apply to Personal Data that is part of Client Data where the management of the Client Data is subject to the Client’s own Privacy Policy, and any request for access, correction or deletion should be made to the Client responsible for the uploading and storage of such data into the Service.

Navigation Information

You may opt out from the collection of navigation information about your visit to the website by Google Analytics by using the [Google Analytics Opt-out feature](https://tools.google.com/dlpage/gaoptout).

Opting out from Commercial Communications

I do not generally use your contact information for marketing purposes. However, if you receive commercial emails from me, you may unsubscribe at any time by following the instructions contained within the email or by sending an email to the address provided in the [“How to Contact Me” section].

Users are able to view and modify settings relating to the nature and frequency of promotional communications that they receive from me by [contacting me using the unsubscribe option link contained within the email].

Please be aware that if you opt-out of receiving commercial emails from me or otherwise modify the nature or frequency of promotional communications you receive from me, it may take up to [ten (10)] business days for me to process your request. Additionally, even after you opt-out from receiving commercial messages from me, you will continue to receive administrative messages from me regarding the delivery of the Service.

If a Client aks me to remove any data, I will respond to their request within [fifteen (15) days. I will delete, amend or block access to any Personal Data that I am storing, only if I receive a written request to do so from the Client who is responsible for such Personal Data, unless I have a legal right to retain such Personal Data. I reserve the right to retain a copy of such data for archiving purposes, or to defend my rights in litigation. Any such request regarding Client Data should be addressed as indicated in the “How to Contact Me” section, and include sufficient information for me to identify the Client and the information to delete or amend.

**Third-Party Services**

The Services I provide may contain features or links to Websites and services provided by third parties. Any information you provide on third-party sites or services is provided directly to the operators of such services and is subject to those operators’ policies, if any, governing privacy and security, even if accessed through the Service. I are not responsible for the content or privacy and security practices and policies of third-party sites or services to which links or access are provided through the Service. I encourage you to learn about third parties’ privacy and security policies before providing them with information].

**Your Privacy Rights**

I will not intentionally share any Personal Data with third-parties for their direct marketing purposes. If my practices change, tney will do so in accordance with applicable laws and I will notify you in advance.

**Interest Based Advertising**

Interest based advertising is the collection of data from different sources and across different platforms in order to predict an individual’s preferences or interest and to deliver to that individual, or his/her computer, smart phone or tablet, advertising based on his/her assumed preference or interest inferred from the collection of data pertaining to that individual or others who may have a similar profile or similar interests.

[I may work with a variety of third parties to attempt to understand the profiles of the individuals who are most likely to be interested in our Services so that I can send them promotional emails or serve our advertisements to them on the Websites and mobile apps of other entities.]

These third parties include: (a) advertising networks, which collect information about a person’s interests when that person views or interacts with one of their advertisements; (b) attribution partners, which measure the effectiveness of certain advertisements; and (c) business partners [or insert as appropriate], which collect information when a person views or interacts with one of their advertisements.

In collaboration with these third parties, I may collect information about my customers, prospects and other individuals over time and across different platforms when they use these platforms or interact with them. [Individuals may submit information directly on my Sites or on platforms run by third parties, or by interacting with me, advertisements, or emails they receive from me or from third parties. I may use special tools that are commonly used for this purpose, such as cookies, beacons, pixels, tags, mobile advertising IDs, flash cookies, and similar technologies. I may have access to databases of information collected by our business partners].

The information I or third party collect enables me (and them) to learn what purchases the person made, what ads or content the person sees, on which ads or links the person clicks, and other actions that the person takes on the relevant Sites, or in response to emails, or when visiting or using third parties’ platforms.

I, or the third parties with which I work, use the information collected as described above to understand the various activities and behaviors of our customers, Site visitors and others. I, or these third parties, do this for many reasons, including: to recognise new or past visitors to our Sites; to present more personalised content; to provide more useful and relevant ads - for example, if I know what ads you are shown I can try not to show you the same ones repeatedly; to identify visitors across devices, third party Websites and sites, or to display or send personalized or targeted ads and other custom content that is more focused on a person’s perceived interest in products or services similar to those that I offer.

Interest-based ads may be served to you in emails or on third-party platforms. I may serve these ads about products or services or send commercial communications directly or through these third parties.

**Third Party Cookies**

I am legally required to disclose whether other third parties may collect personally identifiable information about an individual's online activities from our Site or Service. Please see our Cookie Policy for more information (*link on request*)

The information gathered by these third parties is used to make predictions about your interests or preferences so that they can display advertisements or promotional material on this Site and on other sites across the Internet tailored to your apparent interests.

The business partners and advertising networks that serve interest-based advertisements on the Services have limited access to a small amount of information about your profile and your device, which is necessary to serve you advertisements that are tailored to your apparent interests. It is possible that they may reuse this small amount of information on other sites or services.

I do not intentionally share with these third parties any information that would readily identify you (such as email address); however, these third parties may have access to information about your device (such as IP or MAC address). I do not have access to, or control over, the technologies that these third parties may use to collect information about your interests, and the information practices of these third parties are not covered by this Privacy Policy. Other than as discussed in this document, I have no control over these third parties.

**Minors’ Privacy**

Protecting the privacy of minors is especially important. Our Service is not directed to minors under the age of 16, and I do not knowingly collect Personal Data from persons under the age of 16 without obtaining parental consent. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If I learn that Personal Data has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then I will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may alert me at victoria@looking-glasscounselling.co.uk and request that I delete that child’s Personal Data from our systems.

If you have any question regarding this topic, please contact me as indicated in the [“How to Contact Me”] section. Please be aware that, although I offer this deletion capability, the removal of content may not ensure complete or comprehensive removal of that content or information.

**Data Security**

I follow generally accepted industry standards to protect the information submitted to me, both during transmission and once I receive it. I use ISO compliant cloud services and applications. I maintain appropriate administrative, technical and physical safeguards to protect Personal Data against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse, and any other unlawful form of processing of the Personal Data in our possession. This includes, for example, firewalls, password protection and other access and authentication controls. I use TLS technology to encrypt data during transmission through public internet and ISO compliant cloud services and applications, [and I also employ application-layer security features to further anonymise Personal Data.]

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. I cannot ensure or warrant the security of any information you transmit to me and you do so at your own risk. I also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. If you believe your Personal Data has been compromised, please contact me as set forth in the [“How to Contact Me”] section.

If I learn of a security systems breach, I will inform you of the occurrence of the breach in accordance with applicable law.

**Data Retention**

I only retain the Personal Data collected from a User for as long as the User’s account is active or otherwise for a limited period of time as long as I need it to fulfill the purposes for which I have initially collected it, unless otherwise required by law. I will only retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

**Privacy Settings**

Although I may allow you to adjust your privacy settings to limit access to certain Personal Data, please be aware that no security measures are perfect or impenetrable. I am not responsible for circumvention of any privacy settings or security measures on the Service. Additionally, I cannot control the actions of other users with whom you may choose to share your information. Further, even after information posted on the Service is removed, caching and archiving services may have saved that information, and other users or third parties may have copied or stored the information available on the Service. I cannot and do not guarantee that information you post on or transmit to the Service will not be viewed by unauthorised persons.

**Foreign Visitors**

The Service is hosted in the UK. If you choose to use the Service from regions of the world with laws governing data collection and use that may differ from EU and UK law, then please note that you are transferring your Client Data and Personal Data outside of those regions to the UK for storage and processing. Also, I may transfer your data to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. By providing any information, including Client Data and Personal Data, on or to the Service, you consent to such transfer, storage, and processing.

**Data Controller and Data Processor**

I do not own, control or direct the use of any of the Client Data stored or processed by a Client or User via the Service. Only the Client or Users are entitled to access, retrieve and direct the use of such Client Data. I am largely unaware of what Client Data is actually being stored or made available by a Client or User to the Service and do not directly access such Client Data except as authorised by the Client, or as necessary to provide Services to the Client and its Users***.***

Because I do not collect or determine the use of any Personal Data contained in the Client Data and because it does not determine the purposes for which such Personal Data is collected, the means of collecting such Personal Data, or the uses of such Personal Data, I am not acting in the capacity of data controller in terms of the European Union’s Directive 95/46/EC on data privacy or the European Data Protection Regulation (“GDPR”) and do not have the associated responsibilities under GDPR.

I should be considered only as a processor on behalf of my Clients and Users as to any Client Data containing Personal Data that is subject to the requirements of GDPR. Except as provided in this Privacy Policy, I do not independently cause Client Data containing Personal Data stored in connection with the Services to be transferred or otherwise made available to third parties, except to third party subcontractors who may process such data on our behalf in connection with our provision of Services to Clients. Such actions are performed or authorised only by the applicable Client or User.

The Client or the User is the data controller under the Directive for any Client Data containing Personal Data, meaning that such party controls the manner such Personal Data is collected and used as Ill as the determination of the purposes and means of the processing of such Personal Data.

I am not responsible for the content of the Personal Data contained in the Client Data or other information stored on our servers (or our subcontractors’ servers) at the discretion of the Client or User nor am I responsible for the manner in which the Client or User collects, handles disclosure, distributes or otherwise processes such information.

**Changes and Updates to this Policy**

Please revisit this page periodically to stay aware of any changes to this Policy, which I may update from time to time. If I modify the Policy, I will make it available through the Service, and indicate the date of the latest revision, and will comply with applicable law. Your continued use of the Service after the revised Policy has become effective indicates that you have read, understood and agreed to the current version of the Policy.

**How to Contact Me**

Please contact me with any questions or comments about this Policy, your Personal Data, our use and disclosure practices, or your consent choices by email at victoria@looking-glasscounselling.co.uk

**Changes to this privacy policy**

This privacy policy was published on 23rd May 2018 and last updated on 28th July 2019.