

**Day By Day Counselling** (“we”, “us”, or “our”) is committed to protecting personal data. We comply with the EU General Data Protection Regulation (GDPR). This Privacy Policy describes why and how we collect and use personal data and provides information about individuals’ rights. It applies to personal data provided to us by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this Privacy Policy or as otherwise stated at the point of collection.

Personal data means any information relating to an identified or identifiable natural (living) person. **Day By Day Counselling** may process personal data for a number of reasons, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each reason will differ.

#### Who can you contact for privacy questions or concerns?

If you have questions or comments about this Privacy Policy or how we handle personal data, please contact [daybyday@counsellor.com](mailto:daybyday@counsellor.com)

#### How do we collect personal data?

Directly

We obtain personal data directly from individuals in a number of different ways. These can include:

- via our website (e.g. ‘Contact Us)
- via email
- meeting attendances (e.g. telephone/video conferences)

Indirectly

We obtain personal data indirectly from a number of sources. These can include:

- Referrals from health services
- or schools.

#### What are the categories of personal data that we collect?

We may obtain the following categories of personal data through either direct interactions, client engagements or other situations including those described in this Policy.

Personal data

Personal data commonly collected to conduct our business activities include:

- contact details (e.g. name, contact number, email address)
- location (e.g. current residential address)
- date of birth
- a photograph (e.g. a profile picture, proof of identity).

We may collect some special categories of personal data about individuals where it is necessary to do so. In the event that we do process special categories of personal data, it is with the explicit consent of the individual unless it is obtained indirectly for legitimate purposes. Examples of special categories of personal data we may obtain include:

- Mental and physical health information

- Family history

Consent: We may rely on your freely given consent

#### Do we share personal data with third parties?

Sometimes we may share personal data with trusted third parties where it is absolutely necessary (including schools, social services) – but where possible, we will always seek to gain your consent.

We may share your data with a third party if they provide IT services and support to us. These recipients are either contractually bound to safeguard the data we entrust them or will sign an agreement to ensure this is the case.

#### Do we transfer personal data outside the European Economic Area (EEA)?

No.

#### Do we use cookies?

This website uses cookies. We use cookies to help make our website usable and to understand how visitors interact with us.

Cookies are small text files that can be used by websites to make a user's experience more efficient.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

#### What are your data protection rights?

Your rights are outlined below. To submit a request, please email [daybyday@counsellor.com](mailto:daybyday@counsellor.com)

The right of access to personal data

- You have the right to access your personal data held by us.

The right of rectification

- You have the right to request the correction of personal data held by us to the extent that it is inaccurate or incomplete.

The right to data portability

- You have the right (in certain circumstances) to obtain personal data in a format to allow you to transfer it to another organisation.

The right to withdraw consent

- You have the right to withdraw consent at any time, and the process to withdraw consent will be as easy as the process to give consent.

The right to object

- You have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).

The right to erasure/to be forgotten

- You have the right (in certain circumstances) to request the deletion of personal data where there is no compelling reason for its continued processing.

We may request specific information from you to help us confirm your identity and therefore ensure your rights. This will help us guarantee that personal data is not disclosed to any person who has no right to receive it.

#### Personal data security

The measures we use to ensure personal data security include:

- Putting in place policies and procedures to protect personal data from loss, misuse, alteration or destruction.
- Making sure that access to personal data is limited only to those who need access to it and that confidentiality is maintained.
- Please be aware that the transmission of data via the Internet is not always completely secure. Whilst we will do our utmost to protect the security of your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

#### How long do we retain personal data?

We retain personal data to:

- provide our services
- stay in contact with you
- comply with applicable laws, regulations and professional obligations that we are subject to
- Unless a different time frame applies as a result of business need or specific legal, regulatory or contractual obligations, we retain personal data for two years from the most recent engagement.

We will dispose of personal data in a secure manner when we no longer require it.

#### Data retention

In all instances we take steps to ensure that an adequate level of protection is given to your personal data. Any information provided will only be stored for the necessary amount of time required, after which it will be safely destroyed. By starting to engage with Day By Day Counselling you are agreeing to your data being processed in accordance with these terms.

#### Changes to this privacy policy

We keep our privacy notice under regular review.

This privacy notice was last updated on 27<sup>th</sup> August 2020.