**Privacy Policy for zencepsychology.com**

1. **Introduction**

Zence Psychology is registered as a limited company in England and Wales (Company Number 10042657). Zence Psychology provides psychology, counselling, psychotherapy and consultancy services. The business registered address is 32.01 West Tower, Liverpool, L3 9PH. The director and Data Controller for Zence Psychology is Dr David Goss, registered with the Information Commissioners Office (ICO).

This privacy policy applies to the Zence Psychology website www.zencepsychology.com. This privacy policy outlines how Zence Psychology Ltd uses and protects any information given to the business when you use the website and/or application forms and/or contact methods. This policy sets out your individual rights and in summary they include what data is held about you, how it is held and security measures in place to keep it safe.

Privacy and data policies for each specific service, e.g., counselling and psychotherapy, consultancy etc., are outlined and discussed prior to the commencement of working together.

This policy is displayed on the zencepsychology.com website, can be obtained free as a paper copy if using the services or sent via email upon request.

1. **Information Collected**

***Contact and Referral Information***

Contact information will be collected from individuals who:

* complete a contact form from the zencepsychology.com website
* subscribe to any social media channels used by the business such as twitter
* share information in a direct email, face-to-face, or if referred by a third party
* from any contact by telephone, mobile applications or SMS enquiring about the services offered.

By giving such information, you consent to share this data with Zence Psychology Ltd.

***Data collected during work together***

When a client engages in service provided by Zence Psychology Ltd, further information will be collected prior to the commencement of, and during, working together. This will be held as accurate and pertinent client records to document and review the services provided and for protection from professional liability.

Client records include any used to document the nature, delivery, progress or results of counselling and psychotherapy or any other services. This may include but is not limited to:

* Identifying data for the client
* Referral information (if applicable)
* Dates and types of services and fees
* Details of services provided for example: intake or assessment information; details of the counselling or psychotherapy contract; intervention plans; consultation notes; reports; psychometric testing results.

Zence Psychology Ltd have authored service specific consent forms which outline data processes and will be discussed and agreed prior to the commencement of working together.

***Cookies and website analytics***

Website usage information is collected using cookies.

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

Your browser can be set not to accept cookies however in a few cases some of the website features may not function as a result.

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

We use Google Analytics so that we can continually improve our service to you - read the [Google Analytics privacy policy](https://policies.google.com/privacy/partners?hl=en-GB&gl=uk).

1. **Sharing Information**

Zence Psychology Ltd does not share your personal data with anyone unless explicit informed consent has been provided from you.

Your information will not be shared with any third parties unless:

* you have consented to this
* where your care/service is being transferred to another practitioner and you have consented to information being transferred.
* In a multi-disciplinary setting where you have consented to the records being accessed by other professionals to support the delivery of the service

***Ethical and Legal Requirements to share data***

Operating as a member of British Psychological Society (BPS) and Health and Care Professions Council, Zence Psychology Ltd is bound by a Code of Ethics. It may be necessary to disclose your records or information to third parties if there is a direct and imminent threat to the safety or health of you or another person. This includes:

* If you disclose anything regarding serious harm to yourself or another person (particularly children and vulnerable people)
* If you disclose anything regarding the terrorism act 2006, the drug trafficking act 1994 or money laundering
* Via court order for disclosure
1. **Retention of Data**

Zence Psychology Ltd retains personal information and records only for as long as required to provide services. This will be for 6 years following the completion of our work/last contact. There may be instances where laws and regulations govern records retention otherwise.

All information you provide to us is stored securely. Paper documents are scanned and copied into electronic format or where this is not possible, they are stored in a secure manner. Electronic data is held securely in protected format, accessible only to appropriate staff.

Unfortunately, the transmission of information via the internet cannot be completely secure. We have in place security measures to protect your personal data, but we cannot guarantee the security of your data transmitted to our site, particularly by email; any transmission is at your own risk. Once we have received your information, we will use our own policies and procedures as far as is reasonably possible to prevent unauthorised access.

When client data is disposed of, this is done in an appropriate manner that ensures nondisclosure and preserves confidentiality.

1. **Approaches to security and risk management**

Zence Psychology Ltd is responsible for ensuring privacy and confidentiality is maintained.

Electronic devices that contain or give access to sensitive data and notes will be stored and secured at all times to maintain confidentiality.

Data is collected, transferred and stored using service providers. Data is encrypted and stored according to the highest standards by Zence Psychology Ltd’s service providers. Access to personal information is regularly monitored by Zence Psychology Ltd.

The following are our service providers:

* Apple (including iCloud)
* Wix (wix.com)
* Google
* Microsoft (including include One Drive)
* GoDaddy (email provider)

Our service providers may collect analytics to provide and improve functionality of their services.

***Breaches of security***

Where a breach of security is discovered, you will be informed and all necessary measures will be taken to limit damage either through the business or its service providers.

1. **Your Rights**

Under the General Data Protection Regulation (GDPR) you have rights as an individual data subject which you can exercise in relation to the information we hold about you. You can read more about these rights on the [ICO's website](https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/).

***How to access and/or correct personal information held by individuals***

Individuals have a right to request access to personal information that Zence Psychology Ltd holds about them. Individuals also have a right to request personal information held by Zence Psychology Ltd to be corrected. The GDPR also gives you the right to have the data we hold about you deleted in some circumstances. This is called the 'right to erasure'.

To make such requests please in contact in writing Zence Psychology Ltd at either contact below:

Email: david.goss@zencepsychology.com

Address: 32.01 West Tower

Liverpool, L3 9PH, UK.

***How to complain***

Zence Psychology Ltd aim to meet the highest standards when collecting and using personal information and take any complaints about this very seriously.

If you want to make a complaint about the way Zence Psychology Ltd has processed your personal information, a formal complaint can be made in writing to Zence Psychology Ltd at the address above. A response will be made within 30 days of receiving any complaints.

If the response is unsatisfactory or you would prefer not to contact Zence Psychology, you can contact the ICO as the statutory body which oversees data protection law - see [ICO concerns](https://ico.org.uk/concerns).

1. **Changes to the privacy policy**

Zence Psychology Ltd reserves the right to make changes to this Privacy Policy. The policy is kept under regular review and any updates will be shown on this web page. This privacy policy was last updated 30 July 2019.