

## Website Privacy Notice

The content of this Website Privacy Notice may change, so please remember to check back from time to time.

This version 0.1 was created on 1<sup>st</sup> September 2019. Where I make any changes to this Privacy Policy, I will make this clear on my website.

- This is the website privacy notice of **Dr Desirée Scarpellini**.
- My Practice Addresses are as follows:
  - I. Chilterns CBT, Saint Mary's Court, The Broadway, Amersham, Buckinghamshire, HP7 0UT
  - II. Chilterns CBT, Chalfont Wellness Centre, Chenies Parade, Little Chalfont, Amersham HP7 9FG
- Please consider this notice alongside any therapy practice documents that you are emailed in the course of using my services.
- In this document, "I", "me" or "my" refers to Dr Desirée Scarpellini.

## Introduction

- This is a notice to inform you of my policy about information that I record about you in relation to offering and providing services to you. It sets out the conditions under which I may process any information that I collect from you, or that you provide to me.
- 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 to collect, store, transfer, use or otherwise act on information.

- I regret that if there are one or more points below with which you are not happy, your only recourse is to leave my website immediately.

## **What is my stance towards your privacy?**

1. I, Dr Desirée Scarpellini confirm that I take the protection of your privacy and confidentiality seriously. I understand that all my clients and visitors to my website are entitled to know that their personal data will not be used for any purpose unintended by them, and that I am doing all I can to ensure that it will not accidentally fall into the hands of a third party.
2. I am committed to preserving the confidentiality of information you provide to me, and I hope that you will reciprocate.
3. My policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
4. I registered with the Information Commissioners' Office (ICO) as a "data controller" on 15<sup>th</sup> November, 2017.  
My ICO Data Controller Registration Reference: A8227033
5. The law requires me to tell you about your rights and my obligations to you in regards to the processing and control of your personal data. I do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)
6. Except as set out below, I do not share, or sell, or disclose to a third party, any information collected through my website.

## **The bases on which I process information about you**

- The law requires me to determine under which of six defined bases I process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which I process your personal information is no longer relevant then I shall immediately stop processing your data.

If the basis changes then if required by law I shall notify you of the change and of any new basis under which I have determined that I can continue to process your information.

### **Information I process because I have a contract with you**

- When you become my client, a contract is formed between us as client (service user) and therapist (service provider).
- The service that I provide as therapist to you as a client necessarily involves you providing me with personal information so that I can offer a personalised service to you.
- I process this information on the basis that there is a contract between us, or that you have shared personal information before we enter into a legal contract.
- Additionally, I use information by clients to provide aggregate information, for example to monitor the performance of a particular service I provide. If I use it for this purpose, you as an individual will not be personally identifiable.
- I shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

### **Information I process with your consent**

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse my website or ask me to provide you more information about my services, you provide your consent for me to process information that may be personal information.

Wherever possible, I aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you contact me by email or using my mobile telephone number and request a response.

Except where you have consented to my use of your information for a specific purpose, I do not use your information in any way that would identify you personally. I may use it in a general way and use it to provide aggregate information.

If you have given me explicit permission to do so, I may from time to time pass your name and contact information to selected associates whom I consider may provide services or products you would find useful.

I 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. Please send a 'high priority' email to: [drscarpellini@chilternscbt.space](mailto:drscarpellini@chilternscbt.space)

Once you have withdrawn consent, I am no longer able to provide my services to you.

## **Information I process for the purposes of legitimate interests**

I may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where I process your information on this basis, I do after having given careful consideration to:

- whether I could achieve the same objective by other means
- whether processing (or not processing) might cause you harm
- whether you would expect me to process your data, and whether you would, in the round, consider it reasonable to do so

For example, I may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of my business

- protecting and asserting your rights, my 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 I believe I have a duty to do so

## **Information I process because I have a legal obligation**

I am subject to the law like everyone else. Sometimes, I must process your information in order to comply with a statutory obligation.

For example, I 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**

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

- I store information about your debit or credit card or other means of payment when you first provide it to me.
- I store this payment information in order both to make repeat purchasing of my services easier, and to help me prevent fraud.
- I take the following measures to protect your payment information:
  - I keep your payment information encrypted
  - I do not keep all your payment information so as:
    1. to prevent the possibility of my duplicating a transaction by accident
    2. to prevent any other third party from carrying out a transaction without your consent

- Access to your payment information is restricted to authorised payment processing service providers only.
- I automatically delete your payment information when a credit or debit card expires.

## Payments by Direct Debit

If you pay by Direct Debit, the information you give to me is passed to my own bank for processing according to my instructions. I keep this information only for the duration of the Direct Debit arrangement.

I am 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.

## Contacting me

- When you contact me, whether by telephone, by post, through my website or by e-mail, I collect the data you have given to me in order to communicate with you and to provide information you need about my services.
- I record your request and my reply in order to increase the efficiency of my business.
- I may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track my communications with you so as to provide a high quality service.

## Complaining

- When I receive a complaint, I record all the information you have given to me.
- I use that information to resolve your complaint.
- If your complaint reasonably requires me to contact some other person, I may decide to give to that other person some of the information contained in your complaint. I do this as infrequently as possible, but it is a matter for my sole discretion as to whether I do give information, and if I do, what that information is.
- I may also compile statistics showing information obtained from this source to assess the level of service I provide, but not in a way that could identify you or any other person.
- If you complain about any of the content on my website, I will investigate your complaint. If I feel it is justified or if I believe the law requires me to do so, I shall remove the content while I investigate.
- If I think your complaint is vexatious or without any basis, I shall not correspond with you about it.

## Use of information I collect through automated systems when you visit my website

### 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.
- My website uses cookies. They are placed by software that operates on my servers, and by software operated by third parties whose services I use.
- When you first visit my website, I ask you whether you wish us to use cookies. If you choose not to accept them, I 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 my website.
- I use cookies in the following ways:
- to track how you use my website

to record whether you have seen specific messages displayed on my website

to keep you signed into my site

to record your answers to surveys and questionnaires on my site while you complete them

to record the conversation thread during a live chat with my support team

For more information about how my website uses cookies, please use the 'cookies' tab below.

## Personal identifiers from your browsing activity

- Requests by your web browser to my servers for web pages and other content on my website are recorded.
- I record information such as your geographical location, your Internet service provider and your IP address. I also record information about the software you are using to browse my website, such as the type of computer or device and the screen resolution.
- I use this information in aggregate to assess the popularity of the webpages on my website and how I perform in providing content to you.
- If combined with other information I know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to my website.

## Disclosure and sharing of your information

### Information I obtain from third parties

- Although I do not disclose your personal information to any third party (except as set out in this notice), I sometimes receive data that is indirectly made up from your personal information from third parties whose services I use.
- No such information will be identifiable personally to you.

## Credit reference & Debt Collection

- To assist in combating fraud, I share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payments to me without having first provided an acceptable reason and given me the opportunity to arrange for a refund.

- To assist with recovering debts for services provided and invoiced, I may be required to share information with a debt collection agency.

## **Access to your own information**

### **Access to your personal information**

- At any time you may review or update or request that I remove personally identifiable information that I hold about you. To obtain a copy of any information that is not provided on my website you may send me a request my email: [drscarpellini@chilternscbt.space](mailto:drscarpellini@chilternscbt.space)
- After receiving the request, I will tell you when I expect to provide you with the information, and whether there are grounds for requesting a fee for providing it to you.
- When I receive any request to access, edit or delete personal identifiable information I 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**

### **How you can complain about my privacy policy**

- If you are not happy with my privacy policy or if you have any complaint with respect to how I process your personal information then you should tell me by email. My address is [drscarpellini@chilternscbt.space](mailto:drscarpellini@chilternscbt.space)
- If a dispute is not settled then I hope you will agree to attempt to resolve it by engaging in good faith with me in a process of mediation or arbitration.
- If you are in any way dissatisfied about how I 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/>

## Retention period for personal data

- Except as otherwise mentioned in this privacy notice, I keep your personal information only for as long as required:
- to provide you with the services you have requested;
- to comply with the data processing and storage terms and conditions demanded by my professional regulators, indemnity insurers and tax authorities. For example, my professional indemnity insurers demand that I keep client records for seven years;
- to support a claim or defence in court.

## Compliance with the law

- My 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, please contact me directly by email:  
[drscarpellini@chilternscbt.space](mailto:drscarpellini@chilternscbt.space)
- Review of this privacy policy
- I may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on my website on the day you use my website. I respectfully recommend that you to print a copy for your records.
- If you have any question regarding my privacy policy, please contact me by email:  
[drscarpellini@chilternscbt.space](mailto:drscarpellini@chilternscbt.space)