

# THE FAMILY TREATMENT SERVICE

## PRIVACY NOTICE FOR CLIENTS

Welcome to The Family Treatment Service Limited privacy notice.

The Family Treatment Service Limited is the processor of your personal data.

You are the controller and responsible for your own personal data.

The Family Treatment Service Limited (collectively referred to as the "**Family Treatment Service Limited**", "**Company**", "**we**", "**us**" or "**our**" in this privacy policy.

This privacy notice provides information on how we collect and process your personal data when you visit our website or engage our services in terms of agreeing to our treatment services in accordance with our client terms and conditions or to sign up for a newsletter, purchase a product or service this shall include information concerning our online courses and workshops and pre-recorded online content, digital paperwork, handouts and the sale of books including practitioner books in accordance with the General Data Protection Regulations ("**GDPR**") known after the Brexit transition period as the UK GDPR and the Data Protection Act 2018 ("**DPA 2018**").

It is important that you read this privacy notice together with our website privacy policy which contains more detailed information about our data processing and can be accessed [here](#).

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

- 1.1 We are a multidisciplinary practice with a focus on mental health. We are a limited company registered at Companies House with registration number 09859480 and registered office address of c/o Rayner Essex LLP, Tavistock House South, Tavistock Square, London, United Kingdom WC1H 9LG.
- 1.2 We have appointed a data privacy manager. If you have any questions about this privacy notice or our data protection practices please contact the data privacy manager.

### **2. CONTACT DETAILS**

Our full details are:

Full name of legal entity: The Family Treatment Service Limited

Name or title of data privacy manager: Lara Bobak

Email address: [info@thefamilytreatmentservice.com](mailto:info@thefamilytreatmentservice.com)

Postal address: 39 Church Road, London, SW19 5DQ.

### **3. THE DATA WE COLLECT ABOUT YOU**

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- Contact Data includes billing address, delivery address, email address and telephone number
- Financial Data includes bank account and payment card details;
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us; and
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3.3 We also may collect, use and share aggregated data (Aggregated Data) such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3.4 We will collect certain special categories of personal data (Special Categories) about you but will not generally collect such data unless it is needed in certain circumstances (this may include details about your health and medical care, and genetic and biometric data as and when required).

3.5 Special Categories of particularly sensitive personal information, such as information about your health, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We will not generally be relying on consent to process Special Categories of personal information, and we shall process Special Categories of personal information in accordance with Articles 6 and 9 of the GDPR and in the following circumstances:

- in limited circumstances only and not generally, with your explicit written consent;
- where we need to carry out our legal obligations or exercise rights in connection with the performance of our contract and terms with you;

- where it is needed in the public interest, such as for equal opportunities monitoring or for a legitimate interest;
- where it is necessary to protect you or another person from harm; and
- less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

3.6 We will not collect information about criminal convictions and offences in respect of our clients.

3.7 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making processes, unless we have a lawful basis for doing so and we have notified you of this.

#### **4. HOW WE USE AND COLLECT YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY NOTICE**

4.1 We will only use and collect your personal data for the purpose for which we collected it which include the following:

- to register you as a new client in accordance with our client terms and conditions and client form;
- to process and deliver your treatment;
- to manage your relationship with us;
- to enable you to participate in a prize draw, competition or complete a survey; or
- to recommend products or services which may be of interest to you or conduct any direct marketing activities.

#### **4.2 Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate:

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To on-board you as a new client to receive our services in accordance with our client terms and conditions of service and client form.	(a) Identity (b) Contact (c) Services	Performance of a contract with you
To process and deliver your treatment.	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) To provide treatment to you.

	(e) Marketing and Communications	
To process and deliver your treatment including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) To provide such treatment to you as agreed in our client terms and conditions and client form.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) To provide treatment to you.
To manage our relationship with you which will include: (a) Notifying you about changes to our client terms and conditions or this privacy policy. (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To enable you to receive information such as: (a) online courses (b) Workshops (c) pre-recorded online content (d) digital paperwork (e) Handouts (f) sale of books including practitioner books	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To make suggestions and recommendations to you about our services that may be of interest to you or with your consent at all times, to contact you with regard to direct marketing opportunities, that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).

## 5. HOW WE SHARE YOUR PERSONAL DATA

5.1 We may share your personal data within The Family Treatment Service Limited group and with our internal and external third parties such as our software providers, payroll company, our healthcare consultants and any other internal personnel. Our healthcare consultants may provide you with additional information regarding their

goods and services. Should you require a list of such third parties please contact our data privacy manager.

5.2 Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

5.3 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes without your consent to do so and will only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL DATA TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

## 7. YOUR LEGAL RIGHTS

7.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

7.2 You have the right to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent.

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

### 7.3 **Subject access request rights**

You have the right to make a subject access request for a copy of your personal data that we hold about you. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data is genuine, if you proceed to make a subject access request (or if you wish to exercise any of your other rights as stated above). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it and who is not you. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **7.4 Time limit to respond**

We try to respond to all legitimate requests within one month in accordance with the GDPR and DPA 2018. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Should you wish to raise a subject access request please contact our data privacy manager.

#### **8. MARKETING**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising in accordance with our marketing consent client form.

#### **9. PROMOTIONAL OFFERS FROM US**

9.1 We may use your Identity or Contact, with your explicit consent at all times, to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

9.2 You will receive marketing communications from us if you have requested information and have explicitly opted into our services via completing our marketing consent client form provided from us or if you have purchased any of our services or treatments from us and you have not opted out of receiving that such marketing materials, you shall be provided with the option to "opt out" of our communications via e-mail if you are contacted for direct marketing purposes.

#### **10. THIRD-PARTY MARKETING**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

#### **11. OPTING OUT**

11.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time or by contacting our data privacy manager at Lara Bobak at [info@thefamilytreatmentservice.com](mailto:info@thefamilytreatmentservice.com), or write to us at 39 Church Road, London, SW19 5DQ.

11.2 Where you decide to opt out of receiving such marketing messages, this will not apply to personal data provided to us as a result of a service, treatment purchase, service experience or other transactions that we provide to you in accordance with clause 1.1 above or in respect of our contract with you in accordance with our client terms and conditions and client form as this shall be governed and required in accordance with the performance of a contract entered into between us.

## **12. DATA SECURITY**

- 12.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 12.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **13. DATA RETENTION**

### **How long will you use my personal data for?**

- 13.1 We will retain your personal data for generally no longer than 7 years, subject to any legal exception or litigation risks and shall ensure that we fulfil the purposes we collected your personal data for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 13.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 13.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
- 13.4 By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and HMRC purposes.
- 13.5 In some circumstances you can ask us to delete your data: see your legal rights below for further information.
- 13.6 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.



#### **14. FURTHER DETAILS**

- 14.1 If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing bases, please review further our website privacy policy and data retention policy.
- 14.2 This privacy policy was updated in December 2020, should you require any further assistance of information please contact our data privacy manager Lara Bobak at [info@thefamilytreatmentservice.com](mailto:info@thefamilytreatmentservice.com), or write to us at 39 Church Road, London, SW19 5DQ.

