**Privacy & Cookie Policy**

**1. Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our service users and website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 By using our website and agreeing to this policy, you consent to our use of cookies and processing of personal data in accordance with the terms of this policy.

1.4 We are compliant with the General Data Protection Regulations (GDPR).

1.5 In this policy, “we”, “us” and “our” refer to In the Counselling Chair. For more information about us, see Section 12.

**2. Credit**

2.1 This document was adapted from a template written by SEQ Legal (https://seqlegal.com).

**3. How we use your personal data**

3.1 In this Section 3 we have set out:

(a) the general categories of personal data that we may process;
(b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data
(c) the purposes for which we may process personal data; and
(d) the legal bases of the processing.

3.2 We may process data about your use of our website and services (“usage data”). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is an analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services and will not be shared with third parties. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

3.3 We may process your service data (“service data”). The service data may include your name, email address, phone number. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business.

3.4 We may process your information provided through the contact form on our website (“enquiry data”). The enquiry data may include your name, telephone number and email address. The enquiry data may be processed for the purposes of responding to your enquiry and managing the use of our website and services. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

3.5 We may process your personal data that are provided in the course of the use of our services (“service data”). The service data may include your name, location, telephone number and email address. The source of the service data is you. The service data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the performance of a contract between you and us.

3.6 We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

3.7 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.8 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.9 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3.10 Please do not supply any other person’s personal data to us, unless we prompt you to do so.

**4. Providing your personal data to others**

4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.2 We will not disclose your enquiry data to any third party suppliers of goods and services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services.

4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

**5. International transfers of your personal data**

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

5.2 The hosting facilities of this website are in the United States. Transfers to countries in the European Union will be protected by standard data protection clauses approved by the European Commission.

**6. Retaining and deleting personal data**

6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Your clinical and financial data and any correspondence relating to our work together will be stored securely until seven years after your final session, as required by our professional insurance policy, unless agreed otherwise or there is a legal reason for us to continue storing it.

6.3 Personal data will be retained in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

**7. Amendments**

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page regularly to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy by email.

**8. Your rights**

8.1 In this section we provide a summary of the rights that you have under data protection law. For further details, you should refer to the relevant laws and guidance from the regulatory authorities.

8.2 Your rights under data protection law are:

(a) the right to access;
(b) the right to rectification;
(c) the right to erasure;
(d) the right to restrict processing;
(e) the right to object to processing;
(f) the right to data portability;
(g) the right to complain to a supervisory authority; and
(h) the right to withdraw consent.

8.3 You have the right to access your personal data, together with certain additional information (e.g. any recipients of the personal data). We will supply to you a copy of your personal data unless it affects the rights of a third party. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

8.4 You have the right to have any inaccurate personal data about you rectified and any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data. This includes if the personal data are no longer necessary in relation to the purposes for which they were collected or if you withdraw consent. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.6 In some circumstances you have the right to restrict the processing of your personal data. E.g. you contest the accuracy of the personal data or we no longer need the personal data for the purposes of our processing, but you require it for the establishment, exercise or defence of legal claims. On this basis, we may continue to store your personal data.

8.7 You have the right to object to our processing of your personal data for direct marketing purposes or for scientific, research or statistical purposes or statistical purposes.

8.8 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

8.9 You have the right to withdraw your consent for our processing of your personal information at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.10 You may exercise any of your rights in relation to your personal data by written notice to us.

**9. About cookies**

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either “persistent” cookies or “session” cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

**10. Cookies that we use**

10.1Our service providers use cookies which may be stored on your computer when you visit our website.

(a) We use cookies to identify you when you visit our website and as you navigate the website (cookies used for this purpose are: PHPSESSID: this is used to identify the use and their session, but is not linked to the user’s personal details)

(c) We use cookies as an element of the security measures to protect our website and services generally (cookies used for this purpose are: wfvt\_NUMBER to protect the website from malicious actions)

(e) We use cookies to help us to analyse the use and performance of our website and services (cookies used for this purpose are linked to Google Analytics. Google’s privacy policy is available at: https://www.google.com/policies/privacy/).

(f) We use cookies to store your preferences in relation to the use of cookies more generally (cookies used for this purpose are: COOKIE\_CONSENT)

**11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) https://support.google.com/chrome/answer/95647?hl=en (Chrome);
(b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
(c) http://www.opera.com/help/tutorials/security/cookies/ (Opera);
(d) https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);
(e) https://support.apple.com/kb/PH21411 (Safari); and
(f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you may not be able to use all the features on our website.

**12. Our details**

12.1 This website is owned and operated by In the Counselling Chair.

12.2 This website is hosted by Wix and you can find details of their privacy policy on <https://www.wix.com/about/privacy>.

12.3 You can contact us via our website [contact form](http://tamaramhowell.com/emailme) or email.

**13. Further information**

13.1 For further information please contact us on zlitova@protonmail.com