

PRIVACY POLICY

This Privacy Policy applies between you, the User of this Website, and Calming Minds Therapy, Supervision & Training Ltd, the owner and provider of this Website. Calming Minds Therapy, Supervision & Training Ltd takes the privacy of your information very seriously. This Privacy Policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

Please read this Privacy Policy carefully.

Definitions and Interpretation

In this Privacy Policy, the following definitions are used:

Data	collectively all information that you submit to Calming Minds Therapy, Supervision & Training Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the GDPR, and any national implementing and supplementary laws, regulations and secondary legislation;
GDPR	the UK General Data Protection Regulation;
Calming Minds Therapy, Supervision & Training Ltd, We or us	Calming Minds Therapy, Supervision & Training Ltd, a company incorporated in England and Wales with registered number 15525644 whose registered office is at 31 Wilmslow Road, Cheadle, SK8 1DR;
User or you	any third party that accesses the Website and is not either (i) employed by Calming Minds Therapy, Supervision & Training Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Calming Minds Therapy, Supervision & Training Ltd and accessing the Website in connection with the provision of such services; and
Website	the website that you are currently using, www.calming-minds.com , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

In this Privacy Policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa;
- references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this Privacy Policy;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- "including" is understood to mean "including without limitation";
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this Privacy Policy.

Scope of this Privacy Policy

This Privacy Policy applies only to the actions of Calming Minds Therapy, Supervision & Training Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

For purposes of the applicable Data Protection Laws, Calming Minds Therapy, Supervision & Training Ltd is the "data controller". This means that Calming Minds Therapy, Supervision & Training Ltd determines the purposes for which, and the manner in which, your Data is processed.

Data Collected

We may collect the following Data, which includes personal Data, from you:

- a. name
- b. contact Information such as email addresses and telephone numbers

THERAPY ENQUIRIES

What data do we collect?

Via the website

If you choose to use the 'Contact Us' form on the website, we collect your name, email address, phone number and the information you provide to us in the message box.

Via email

We collect any information you choose to share to us in your email including email address

Via Telephone

We collect any information you choose to share with us. If information is written this will be shredded once the information has been added to the most appropriate electronic system that we use, if this is necessary to progress with your request/enquiry.

Via third party referral

We collect data transferred to us by e.g. insurance company, including name, email address and phone number.

Where is this stored and who has access?

Enquiry and referral data are stored on our email and online calendar 'Outlook' and 'Microsoft 365 for business' (GDPR compliant) or our clinical system 'Writeupp (details below).

Your name, email address, telephone number and notes will be accessed, if necessary, by our Clinical and Business Directors as well as your therapist.

How is this used?

A senior person from the service will contact you via phone or email to discuss your enquiry or referral. If it's a referral call, notes will be taken and if a referral proceeds, these details will be recorded and stored in our fully compliant and ISO certified Clinical System 'Writeupp'. Further details about the system can be found here: [Security | WriteUpp](#)

Your details will not be added to any news or marketing mailing lists. These data are processed under the legal basis of 'Legitimate interests'

Your rights:

- You have the right to request access to your personal data
- You have the right to rectify any inaccurate personal information
- You have the right to withdraw consent for us to process your data
- You have the right to request the erasure of your personal data

Please email admin@calming-minds.com with your requests. Please note that we may be obliged to refuse these requests in accordance with lawful requirements and the BABCP standards of conduct.

THERAPY SESSIONS

What data do we collect?

Our registration form via 'Writeupp' collects the following information: Name, DOB, GP, Gender, Address, Language, Ethnicity, Contact Information, Email address, Next of Kin Information.

Our clinicians will collect any record any information you choose to share.

Where is this stored and who has access?

This information is stored in Writeupp and will only be accessed by the therapist you are working with and the Clinical and Business Directors (if necessary).

If you provide your email address and phone number we will assume that you have provided your consent for us to contact you using this information either by text message or email. If you provide an address we may use this to send you information through the post, unless you advise us otherwise.

These data are processed under the legal basis of 'Legitimate interests'. Any further sensitive data that are shared is processed under the 'Special category condition' for the provision of health care.

Your rights:

- You have the right to request access to your personal data
- You have the right to rectify any inaccurate personal information
- You have the right to withdraw consent for us to process your data
- You have the right to request the erasure of your personal data

Please email admim@calming-minds.com with your requests. Please note that we may be obliged to refuse these requests in accordance with lawful requirements and the BABCP professional code of conduct. Our standard practice will be to erase your data 7 years after the end of your therapy, or for children, 7 years after the client turns 18 years of age.

All devices are protected with SSL encryption, malware protection and password security.

Your personal data will not be shared with any additional parties with the exception of the below circumstances when your therapist is under legal obligation to provide information to the appropriate agencies (e.g. GP, the police, Social Services etc.):

- They perceive that you are a danger to yourself or others
- They perceive that a minor is at risk
- They are required to share information under a court order or by law
- They are required to disclose information for the prevention, detection or prosecution of a crime

Your therapist will aim to discuss such concerns and obligations with you before notifying relevant parties, however this may not always be possible, and they will use clinical judgment to act in the best possible way to minimize possible harm.

CLINICAL SUPERVISION SESSIONS

What data do we collect?

Your name, email address, phone number, employment details, summary of the supervision sessions and your clients' sessions (client's initials only).

Where is this stored and who has access?

Personal details and session summary notes are usually collected on manual paper files and stored in locked filing cabinets, accessed by your supervisor only. Any electronic notes will be stored in your therapists personal area of the online storage account within (GDPR compliant).

Your supervisor may discuss your sessions with his/her own clinical supervisor in line with the professional code of conduct.

Your name, email address and phone number are stored on your supervisor's smartphone under password

protection. Your phone number and any electronic messages may be stored on your supervisor's SMS application.

All devices are protected with SSL encryption, malware protection and password security. Your name and email address will be used by our staff to send you monthly invoices.

This data is processed under the legal basis of 'Legitimate interests'.

Your rights:

- You have the right to request access to your personal data
- You have the right to rectify any inaccurate personal information
- You have the right to withdraw consent for us to process your data
- You have the right to request the erasure of your personal data

Please email admin@calming-minds.com with your requests. Please note that we may be obliged to refuse these requests in accordance with lawful requirements and the BABCP professional code of contact. Our standard practice will be to erase your data 7 years after the end of your supervision in each case, in accordance with this Privacy Policy.

How We Collect Data

We collect Data in the following ways:

- data is given to us by you; and
- data is collected automatically.

Data That is Given to Us by You

Calming Minds Therapy, Supervision & Training Ltd will collect your Data in a number of ways, for example: when you contact us through the Website, by telephone, post, e-mail or through any other means;

- when you use our services;
- in each case, in accordance with this Privacy Policy.

Data That is Collected Automatically

To the extent that you access the Website, we will collect your Data automatically, for example:

- we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

Our Use of Data

Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website.

Specifically, Data may be used by us for the following reasons:

- internal record keeping;
- in each case, in accordance with this Privacy Policy.

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

Who We Share Data With

We may share your Data with the following groups of people for the following reasons:

- our employees, agents and/or professional advisors - to assign your referral to the appropriate clinician; in each case, in accordance with this Privacy Policy.

Keeping Data Secure

We will use technical and organisational measures to safeguard your Data, for example:

- access to your account is controlled by a password and a user name that is unique to you.
- we store your Data on secure servers.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: admin@calming-minds.com

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data Retention

Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this Privacy Policy or until you request that the Data be deleted.

Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your Rights

You have the following rights in relation to your Data:

- **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
- **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
- **Right to erase** - the right to request that we delete or remove your Data from our systems.
- **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
- **Right to data portability** - the right to request that we move, copy or transfer your Data.
- **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: admin@calming-minds.com

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to Other Websites

This Website may, from time to time, may provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This Privacy Policy does not extend to your use of such websites. You are advised to read the Privacy Policy or statement of other websites prior to using them.

Changes of Business Ownership and Control

Calming Minds Therapy, Supervision & Training Ltd may, from time to time, expand or reduce our business

and this may involve the sale and/or the transfer of control of all or part of Calming Minds Therapy, Supervision & Training Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

- We may also disclose Data to a prospective purchaser of our business or any part of it.
- In the above instances, we will take steps with the aim of ensuring your privacy is protected.

General

You may not transfer any of your rights under this Privacy Policy to any other person. We may transfer our rights under this Privacy Policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this Privacy Policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to This Privacy Policy

Calming Minds Therapy, Supervision & Training Ltd reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Privacy Policy on your first use of the Website following the alterations.

Attribution

This Privacy Policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (<https://www.rocketlawyer.com/gb/en>).

This Privacy Policy was created on **28 March 2024**.