

Sarah Pagdin

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Data Protection & Privacy Policy

Who we are and what we do

We are Acuo, a multi-disciplinary consulting practice. We offer a wide range of services tailored to the needs of individuals and businesses. We also work with associates, partners, and third-party organisations who allow us to offer an even wider range of services. Our services for individuals are delivered under the trading name “Sarah Pagdin Psychology” while our services for businesses are delivered under the trading name “Acuo Consulting”. Together we are Acuo.

Our commitment

Although we may need to collect and hold certain personal data in order to deliver our services to you we are committed to protecting and respecting your privacy. This policy provides an overview of how we comply with data protection legislation and the basis on which any personal data we collect from you, or that you provide to us, will be processed.

We will never sell your Personal Data. Where we share it with third parties we do so on the understanding that they will use it only for purposes directly involved with their delivery of services to us.

Full details of who we may share your data with is available to clients on request.

How we obtain personal information

If you contact us, whether by telephone, email, website, written letter, or other means, we may keep a record of that correspondence. We may ask you to complete various questionnaires and other forms that we will use to tailor our services to your needs. We may keep records of any meetings and sessions in the form of written notes, electronic notes or audio recordings¹. We may receive correspondence from you or from other individuals or organisations relating to the services we deliver to you. We may also create notes, assessments, reports or other relevant work products.

What personal information we collect and how we use it

We work with individuals and businesses and the information we collect is different for each of these two groups. To try and make things as clear as possible we have split this document to reflect the information we collect for each of these groups. Hopefully it is clear to you which group you fall in, but if not please let us know and we will be happy to answer any questions you may have. There is some information that we collect for all of our clients, we cover this first.

¹ We will only make audio recordings where we have your written consent to do so.

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At the end of the document we also talk about how long we keep data for (data retention and destruction), and what your rights are under data protection legislation. These sections both apply whether you are an individual or a business.

For Everyone

We need to collect certain information whether you are an individual or business customer. This might be because the way we collect the data is the same for both groups, or it might be related to legal or regulatory obligations that apply to everything we do.

Mobile communications

Some of our contact may take place via mobile communications systems such as mobile phone messaging or iMessage. We will only use these systems where you have asked us to do so, but where we do we may need to hold some of your personal data to facilitate the contacts. Some information is also stored by the service providers.

This information may include:

- Your full name,
- Your telephone number(s),
- Text messages,
- Voicemail messages, and
- Meta data.

Service providers generally do not record the messages that are exchanged but they do store what is called “Meta Data”. This is service data, such as who was contacted and how long the call was for.

Financial records

We are required by law to hold information on payments received for our financial records. This information may include:

- Your full name,
- Your email address,
- If you are a business, your business name and correspondence address,
- The dates and amounts of payments and invoices, and
- Payment data that allows us to create our financial records.

Notification data

We need to hold some information so that we can inform you in the event of a breach of your personal data. Unless you specifically ask us not to, we will hold this information for as long as we hold any other personal data about you.

This information may include:

- Your full name,
- Your postal address, and
- Your email address.

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If this information changes, please let us know as otherwise we would not be able to contact you if we needed to do so.

Services for Individuals

This section will apply if you are a client of our therapeutic services. If you are a clinical supervisee this section also applies to you, but we will not need to collect as much information. The information we may hold falls into the following categories.

Personal contact information

We hold contact information that you have provided to us and which we use to contact you about the delivery of services. We hold some information for a while after you have finished your work with us in case we need your help in resolving a query.

This information may include:

- Your name,
- Your telephone number(s),
- Your email address,
- Your postal address, and
- Your online service IDs (such as for Skype).

General information

We hold general information that you have provided to us and which we use to manage the delivery of services to you. Some of this information also enables us to comply with our legal or regulatory obligations. We hold some information for a while after you have finished your work with us in case we need to use it to resolve queries.

This information may include:

- Your full name, including title,
- Your preferred name,
- Your date of birth,
- Details of someone we can contact in case of emergency,
- Details of your GP,
- The date of your first contact with us,
- Your contact preferences,
- General notes of a non-sensitive nature,
- The dates, times and locations of appointments,
- A record of your attendance at sessions,
- Your signature on documents, either digital or ink-on-paper,
- Copies of agreements relating to our services,
- General correspondence, with you or with others, relating to the services we provide to you, and
- Reference IDs and other information relating to any third parties involved with your case.

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If you are a clinical supervisee we may also hold information relating to your employment where that is relevant to the services we provide to you. This information may include:

- Employment details & history,
- Employer contact details, and
- Clinical caseload statistics.

Familial relationships

We will always ask for a nominated In Case of Emergency contact to ensure that we are able to comply with sensible health and safety arrangements. If we require consent from a parent or guardian to deliver services to you, or if a family member, guardian, or other agreed person is directly involved in your case, then we may need to hold some contact and general information about those individuals.

Sensitive clinical information

Due to the nature of our services we may need to process data relating to your physical and mental health. The General Data Protection Regulations deem data concerning health as a special category of personal data which means that we need specific reasons for processing this data. These reasons relate to the type of services that we deliver to you. We may also need to hold some of this information after you have finished your work with us in case there is a legal query.

The information we hold may include:

- Your personal history, including anything that you feel may be relevant to our work together,
- Details and history regarding your family,
- Details of your current medication,
- Details of other clinicians who may be involved in your case,
- Diagnostic questions and answers,
- The results of psychometric tests,
- Detailed notes relating to our work together, and
- Sensitive clinical information about your case, including correspondence with you or with other professionals who may be involved.

Who might we share your personal data with?

If you are a client of our therapeutic services, we may share your Personal Data with selected third parties that help us to deliver our services. We will never share your Special Category Data with these organisations.

We may share your Special Category Data with other professionals or organisations involved in your case, but we will make sure you are aware of this.

Each of our clinical practitioners undergoes regular formal supervision. As part of these sessions it may be necessary to discuss your personal data, including special categories of personal data, with the supervisor who will be a qualified professional operating under

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terms of confidentiality. We will not share with a supervisor any personal data that could be used to directly identify you.

Services for Businesses

This section will apply if you are a client of our business services, including professional mentoring and training, or a supplier, although we will probably hold less information in the latter case. The information we may hold falls into the following categories.

Business contact information

We hold contact information that you have provided to us about you and other contacts in your business and which we use to contact you and them about the delivery of services. Unless you tell us otherwise we assume that this is business contact information rather than personal. We usually hold onto your contact information for a while after each contract has ended in case we need your help in resolving a query.

This information may include:

- Full name,
- Telephone number(s),
- Email address,
- Other online service IDs where relevant, and
- Correspondence address.

General information

We hold general information that you have provided to us about you and other contacts in your business and which we use to manage the delivery of our services. Some of this information also enables us to comply with our legal or regulatory obligations. We usually hold onto this information for a while after each contract has ended in case we need to use it to resolve queries.

This information may include:

- Full name, including title,
- Position, role, and responsibilities,
- Business name and details,
- Dates, times & locations of meetings,
- Meeting minutes, including the names of attendees,
- Correspondence, with you or with others, relating to the services we provide,
- Copies of contracts and agreements between your business and ours,
- Information on the services we deliver to you, or you deliver to us, and
- Business work product, including notes, drawings, documentation, etc. produced independently or collaboratively.

We also hold business information that does not contain personal data and so does not fall within the scope of this document. If you would like to understand what other information we hold about your business, please let us know.

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Who might we share your business' information with?

We may share Personal Data relating to our business contacts with selected third parties that help us to deliver our services. This may include your Personal Data and that of any contacts within your business that you have shared with us.

We will not share any sensitive business information to which you hold the copyright or intellectual property rights unless we have a confidentiality agreement in place with the third party or you have authorised us to do so.

Data retention and destruction

We do not keep information about you any longer than is necessary. The length of time we keep your data may be determined by statutory or regulatory requirements. We delete or destroy all personal data when it is no longer required.

A copy of our data retention policy is available to clients on request. This shows how long we would expect to keep your data and why.

Your rights under data protection legislation

You have various rights under the relevant data protection legislation. If you wish to exercise any of these rights, then please contact us in writing (see 'How to contact us' below).

We are confident that we will be able to answer any questions you may have, but should you feel it is necessary you do have the right to contact the UK Information Commissioner's Office to discuss the matter further.

Subject Access

You have the right to see what personal data we hold about you. You also have the right to know where we got the data from, how and why we are processing your data, who it has been shared with, and how long we intend to keep it for.

Rectification

You have the right to ask us to investigate, and correct where appropriate, any personal data we hold about you that you believe is wrong.

Erasure

You have the right to ask us to erase personal data that we hold about you where we no longer have a lawful purpose to process the data, or where the data is being processed based on your consent which has now been withdrawn.

This right may be restricted by our need to comply with laws, regulations or other legitimate reasons that require us to retain data. However, we will tell you if this is the case.

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Restriction of Processing

You have the right to ask us to restrict the processing of your personal data. Restricted processing means that we cannot make any changes to the data unless we have your consent. You can ask for restricted processing where:

- You believe the data we hold is inaccurate and we need time to properly investigate,
- We have unintentionally come into possession of your personal data that we should not hold but you do not want us to delete it,
- Where we no longer need your personal data, but you want us to hold on to it for legal reasons, or
- Where you have objected to how we use your personal data, and this is being investigated.

Once your treatment ends we will automatically restrict the processing of any personal data that we need to keep.

Right to Object

Where you feel that we are processing your personal data in a way that is inappropriate you have the right to object and so ask us to demonstrate legitimate grounds for doing so. This includes asking us not to communicate with you other than in ways you choose.

Right to not be subject to Automated Decision-making or Profiling

We do not make decisions based on automated processing or profiling.

How to contact us

If you would like any further information, or you would like to exercise any of your data protection rights, please get in touch.

By email at: enquiries@acuo.co.uk