

# Privacy Notice - Comprehensive Version

This is the privacy notice of Adam Goward

## Introduction

1. This is a notice to inform you of my policy about all information that I record about 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 collect, store, transfer, use or otherwise act on information.
2. I take seriously the protection of your privacy and confidentiality. I understand that all our clients are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
3. I undertake to preserve the confidentiality of all information you provide to me, and hope that you reciprocate.
4. This policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires me to tell you about your rights and our obligations to you in regard 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 our 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.

### 1. Information I process because I have a contract with you

When you become a client, a contract is formed between you and me.

The service I provide to you as a client necessarily entails you providing me with personal information.

I process this information on the basis there is a contract between us, or that you have requested I use the information before I enter into a legal contract.

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.

### 2. Information I process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask me to provide you more information about my services, you provide your consent

to 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 write to me requesting a response.

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

If you have given me explicit permission to do so, I may pass your name and contact information to another or additional service which may be beneficial to you.

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 by e-mail at [adamgowardcounselling@gmail.com](mailto:adamgowardcounselling@gmail.com)

If you do so, I shall not be able to continue to provide services.

### **3. 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 me, 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.

### **4. 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 to us**

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

Your debit or credit card number and other payment information is never taken by, or transferred to, me either through my website or otherwise.

## 6. 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 reply with the information you need.

I may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high-quality service. Information apart from your email address is kept as a paper version and electronic copies deleted.

## 7. Complaining

If 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 of 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 our website or in any brochure, I shall 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

### 8. Cookies

If you visit my website, a separate Privacy Statement which includes information specific to web browsing, is available on the footer at the right hand side of each page.

## Disclosure and sharing of your information

### 9. Information I obtain from third parties

Although I do not disclose your personal information to any third party (except as set out in this and the confidentiality notice), I may sometimes receive data that is indirectly made up from your personal information from third parties whose services I use.

## Access to your own information

### 10. Access to your personal information

10.1 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 at [adamgowardcounselling@gmail.com](mailto:adamgowardcounselling@gmail.com)

10.2 After receiving the request, I will tell you when I expect to provide you with the information.

- 10.3 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

### 11. How you can complain about our privacy policy

- 11.1 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.
- 11.2 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.
- 11.3 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/>

### 12. Retention period for personal data

Except as otherwise mentioned in this privacy notice, I keep your personal information only for as long as required by us:

- 12.1 To provide you with the services you have requested;
- 12.2 To comply with other law, including for the period demanded by our tax authorities;
- 12.3 To support a claim or defence in court.

### 13. 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, I should like to hear from you.

### 14. 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 detailed within this notice on the day it was mailed to you. I advise you to print a copy for your records.

If you have any question regarding my privacy policy, please contact me.