Privacy Policy for Therapeutic Pathways CIC

We want to protect your privacy and confidentiality. We understand that all users of our web site are quite rightly concerned to know that their data is being used lawfully. We take our responsibilities under Data Protection Act, and in due course GDPR, very seriously and we want to comply with the spirit and the letter of the guidance provided by the Information Commissioners Office You can find information about ICO at their website <https://ico.org.uk>

We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our web site immediately.

We do not share, or sell, or disclose to a third party, any personally identifiable information collected at this site.

The law requires us to determine how we process different categories of your personal information, and to notify you of the basis for each category.

This Privacy Policy shares how we collect and process your personal data through use of our sites. We do not market to children, nor do we sell products or services for purchase by children. By providing us with your data, you warrant to us that you are over 18 years of age. Therapeutic Pathways CIC is the data controller and is responsible for your personal data.

Contact Details

Name: Therapeutic Pathways CIC

Email address: info@therapeutic-pathways.co.uk

Registered address: 5 Newlands Avenue, Boughton, Newark, NG22 9JQ

Telephone number: 07540381919

It is very important that the information we hold about you is accurate and up to date. Please let us know if your personal information changes via email or post address above.

What data we collect about you, for what purpose and on what grounds we process it.

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process the following categories of personal data about you:

**Communication Data** that includes any communication you send to us whether that be through the website, email, text, social media messaging/posting or any other communication methods. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests, which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

That includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground 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.

**Membership Data** that includes data relating to your membership of any of our communities, including name, e-mail address, location, along with any communication that you send to us such as questions to include and feedback that you provide on our service. We process this data to supply the membership services you have signed up for and to keep records of such transactions. Our lawful ground 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.

**User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

**Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising.  Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

**Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free giveaways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising.  Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

#### **Sensitive Data** We do not collect any Sensitive Data about you. Sensitive Data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data. We do not collect any information about criminal convictions and offences.

We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interests which are to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business)

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don’t provide us with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at the above address. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing. We may process your personal data without your knowledge or consent where this is required or permitted by law. We do not carry out automated decision making or any type of automated profiling.

How we collect your personal data

We may collect data about you by you providing the data directly to us (for example by filling in forms on our site or by sending us emails). We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our [cookie policy](http://www.dreambelieveattract.com/cookie-policy) for more details about this.

We may receive data from third parties such as analytics providers such as Google based outside the EU, as well as providers of technical, payment and delivery services.

Marketing Communications

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and, in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

We do not share your personal data with any third party for their own marketing purposes.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at the above address at any time.

If you opt out of receiving marketing communications this opt-out does not apply to personal data provided as a result of other transactions, such as purchases, warranty registrations etc.

Disclosures of your personal data

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

We may have to share your personal data with the parties set out below:

* Service providers who provide IT and system administration services.
* Professional advisers including lawyers, bankers, auditors and insurers
* Government bodies that require us to report processing activities.
* Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

International transfers

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is in place:

* We will only transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
* Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
* If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.  We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, the potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes, the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances, we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to the portability of data and (where the lawful ground of processing is consent) to withdraw consent.  You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights, please email us at the above address.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk/)).

We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.  See Complaints Policy and Procedure for more information.

Third party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Some of the links on this site are ads, partners, or affiliates. This means I may make a small commission if you buy from the linked sites.

Choice/Opt-Out

Our site provides users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any e-mail they receive from us at any time.

Users who no longer wish to receive our newsletter or promotional materials may opt-out of receiving these communications by clicking on the unsubscribe link in the e-mail.

Intellectual Property Rights

The materials contained in our web site are protected by applicable copyright and trade mark law.

All copyrights, trademarks, patents and other intellectual property rights in and on our website and all content and software located on the site shall remain the sole property of Therapeutic Pathways CIC or its licensors.

The use of our trademarks, content and intellectual property is forbidden without the express written consent.

**You must not:**

* Republish material from our website without prior written consent.
* Sell or rent material from our website
* Reproduce, duplicate, create derivative, copy or otherwise exploit material on our website for any purpose
* Redistribute any content from our website, including onto another website

Use of Testimonials

Testimonials that appear on this site are actually received via text, audio or video and are reflecting real life experiences of those who have used our products and/or services in some way. They are individual results and results do vary. We do not claim that they are typical results. The testimonials are not necessarily representative of all of those who will use our products and/or services.

The testimonials displayed in any form on this site (text, audio, video or other) are reproduced verbatim, except for correction of grammatical or typing errors. Some may have been shortened. In other words, not the whole message received by the testimonial writer is displayed when it seems too lengthy or not the whole statement seems relevant for the general public.

Therapeutic Pathways CIC is not responsible for any of the opinions or comments posted on https://www.therapeutic-pathways.co.uk or other related social media sites. They are not a forum for testimonials; however, it provides testimonials as a means for customers to share their experiences with one another. To protect against abuse, all testimonials appear after they have been reviewed by

Therapeutic Pathways CIC the opinions are strictly the views of the testimonial source.

The testimonials are never intended to make claims that our products and/or services can be used to diagnose, treat, cure, mitigate or prevent any disease. Any such claims, implicit or explicit, in any shape or form, have not been clinically tested or evaluated.

Cookies

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

Governing Law

This Agreement (and any further rules, polices, or guidelines incorporated by reference) shall be governed and construed in accordance with the laws of the United Kingdom without giving effect to any principles of conflicts of law.

Changes to this Agreement

Therapeutic Pathways CIC reserves the right, at their sole discretion, to modify or replace Policies, Terms and Conditions and Client Contracts by posting the updated terms on the website. Continued use of the website after any such changes constitutes acceptance of the new Policy, Terms and Conditions and Client Contact.

Please review this Agreement periodically for changes. If you do not agree to any of this Agreement or any changes to this Agreement, do not use, access or continue to access the website or other related digital sites or discontinue any use of the website or digital sites immediately.

A **copy of this Privacy Policy** can be requested from info@therapeutic-pathways.co.uk at any time.