

## Online Therapy Hub Privacy Policy

### Introduction:

This Privacy Policy for The Therapy Hub (doing business as Online Therapy Hub) ('Online Therapy Hub', we, us or our) describes how and why we might collect, store, use, and / or share ('process') your information when you use our services (services), such as when you visit our website at [www.therapyhub.org](http://www.therapyhub.org) or any website of ours that links to this privacy notice and when you engage with us in other related ways, including any sales, marketing, or events.

We are registered with the Information Commissioner's Office (ICO) and this Privacy Policy is written to comply with and uphold our responsibilities with that office.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practises, please do not use our services. If you still have any questions or concerns, please contact us at [thetherapyhubuk@gmail.com](mailto:thetherapyhubuk@gmail.com).

### Summary of key points:

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by using our table of contents below to find the section you are looking for.

**What personal information do we process?** When you visit, use, or navigate our services, we may process personal information depending on how you interact with Online Therapy Hub and the services, the choices you make, and the products and features you use.

**Do we process any sensitive personal information?** We may process sensitive personal information when necessary, with your consent or as otherwise permitted and required by applicable law.

**Do we receive any information from third parties?** We do not receive any information from third parties unless expressly provided or requested by you /with your permission.

**How do we process your information?** We process your information to provide, improve, and administer our services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.

**In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties.

**How do we keep your information safe?** We have organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

**What are your rights?** Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

**How do you exercise your rights?** The easiest way to exercise your rights is by completing a data subject request by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

**Want to learn more about what Online Therapy Hub does with any information we collect?** See below to see details in full.

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### **1. What information do we collect?**

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services, when you participate in activities on the services, or otherwise when you contact us.

- **Personal information provided by you:** The personal information that we collect depends on the context of your interactions with us and the services, the choices you make, and the products and features you use. The personal information we collect may include the following: names, phone numbers, e-mail addresses, mailing addresses, job titles, contact preferences, contact or authentication data, billing addresses, debit / credit card numbers.
- **Sensitive information:** When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information: health data, data about a person's sex life or sexual orientation, information revealing race or ethnic origin, information revealing religious or philosophical beliefs.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### **2. How do we process your information?**

We process your personal information for a variety of reasons, depending on how you interact with our services, including:

- **To deliver, and to facilitate delivery of services to the user.** We may process your information to provide you with the requested service.

- **To respond to user enquiries / offer support to users.** We may process your information to respond to your enquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To protect our services.** We may process your information as part of our efforts to keep our services safe and secure, including fraud monitoring and prevention.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm to you or someone else.

### 3. What legal bases do we rely on to process your information?

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information. You can withdraw your consent at any time.
- **Performance of a contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our services or responding to a request prior to entering into a contract with you.
- **Legitimate interests.** We may process your information when we believe it is necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for the purposes described in order to diagnose problems and / or prevent fraudulent activities.
- **Legal obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a Law Enforcement body or Regulatory Agency, exercise or defend our legal rights, or disclose information as evidence in litigation in which we are involved.
- **Vital interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

### 4. When and with whom do we share your personal information?

We may need to share your personal information with the following people:

- Doctors or other medical/ mental health professionals.
- Social Services or other Statutory Authorities
- Law Enforcement bodies and Courts

Where possible, consent will always be sought to share any personal information we hold. However, there are lawful exceptions to this, for example where consent cannot be reasonably obtained and / or there is a need to prevent harm to you or someone else.

### 5. How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example because your personal information has been stored in backup archives) then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **6. How do we keep your information safe?**

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cyber criminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

Although we do our best to protect your personal information, transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

## **7. What are your privacy rights?**

In the UK you have certain rights under applicable Data Protection laws. These include the right to:

- i. Request access and obtain a copy of your personal information
- ii. Request rectification or erasure
- iii. Restrict the processing of your personal information
- iv. Data portability.

In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting [thetherapyhubuk@gmail.com](mailto:thetherapyhubuk@gmail.com).

We will consider and act upon any request in accordance with applicable Data Protection laws.

If you are located in the UK and you believe we are unlawfully processing your personal information, you also have the right to complain to our local data protection supervisory authority. You can find their contact details here: [https://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at [thetherapyhubuk@gmail.com](mailto:thetherapyhubuk@gmail.com).

However, Please note that this will not affect the lawfulness of the processing before consent withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may e-mail us at [thetherapyhubuk@gmail.com](mailto:thetherapyhubuk@gmail.com).

## **8. Controls for do-not-track features.**

Most web browsers and some mobile operating systems and mobile applications include a do-not-track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practise in a revised version of this privacy notice.

## **9. Do we make updates of this notice?**

We may update this privacy notice from time to time.

The updated version will be indicated by an updated 'revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification.

We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **10. How can you contact us about this notice?**

If you have questions or comments about this notice, you may e-mail us at [thetherapyhubuk@gmail.com](mailto:thetherapyhubuk@gmail.com).

## **11. How can you review, update, or delete the data we collect from you?**

You have the right to request access to the personal information we collect from you, change that information, or delete it.

To request to review, update, or delete your personal information, please send us a data subject access request letter.

**Last Updated 15 March 2023**

Michelle Copley

Therapy Hub Clinical Lead and Data Processing Officer