Privacy Policy

Sarah Morris Therapy

Our contact details

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About Your Privacy and This Privacy Policy

Your privacy is extremely important to us. We are constantly putting a great deal of thought, effort, tools, resources and procedures in place in order to protect and safeguard your privacy. This document is our "Privacy Policy," and it contains details on issues related to your privacy when using our services. This Privacy Policy applies to visitors to the public websites owned and operated by Sarah Morris Therapy, the registered users of Sarah Morris Therapy’s associated mobile and web application (collectively with the websites, the "Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform"), and to the counselors that provide the Counselor Services ("Counselors"). It is intended to inform you of our policies, procedures, and practices regarding the collection, use and disclosure of any information that you provide through the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

The Privacy Policy is part of our Terms and Conditions. The terms in the Privacy Policy (such as, but not limited to, "we", "our", "us", "Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform", and "Counselor Services") have the same meaning as in our Terms and Conditions document. When you use our Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, you accept and agree to both the Terms and Conditions and to the Privacy Policy. If you do not agree to be bound to the Privacy Policy you should stop using the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform immediately or cease to provide the Counselor Services, as applicable. By accessing and using our Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform or providing the Counselor Services, as applicable, you affirm that you have read the Terms and Conditions and the Privacy Policy and that you understand, agree to and acknowledge all the terms contained in both of them.

**Information Collection, Use, and Disclosure**

**Categories of Information Collected**

To let us operate the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform effectively and to let you use the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, including the Counselor Services, we may collect, use, and store the information described below. We also disclose certain information to third parties, as described further below. The information we collect is received directly or indirectly from you and generated in the course of your use of the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform. The data we collect is not used for marketing or any other purposes except as specified in this Privacy Policy.

**Visitor Data:** Sarah Morris Therapy does not collects, use, or stores data regarding user visits to its website and use of the Sarah Morris Therapy application ("Visitor Data"), including the particular pages visited or viewed by the user, the amount of time the user spent on the website or application, website errors experienced by the user, visits to the Sarah Morris Therapy "FAQ" page, and information about the browser or device used to access the website and application, such as the user’s mobile device ID and IP address.

Data is collected from visitors to the site who email us or interact with the contact us section of the website. These practices apply to users who visit pages for prospective new customers as well as those who visit pages for prospective Counselors.

Onboarding Data: Sarah Morris Therapy collects, uses, and stores certain additional data from users during the onboarding process ("Onboarding Data"). This is in the form of completing initial consultation questionnaires and responses provided by users (including Counselors) in the process of initial registration.

Account Registration Data: Sarah Morris Therapy collects, uses, and stores certain information in connection with the account registration process, such as when a user verifies their reported email address, next of Kin, GP, personal information pertaining to therapy or phone number ("Account Registration Data"). Sarah Morris Therapy also assigns each user (including Counselors) who creates a Sarah Morris Therapy account an anonymized, sequentially-generated client ID.

Transaction Data: Sarah Morris Therapy collects, uses, and stores certain information regarding payment for its services by users and related transactions on its website, such as whether a user completed payment for Sarah Morris Therapy’s services, signed up for Sarah Morris Therapy’s services using a trial offer, cancelled or otherwise ended a trial, or completed a request to donate financial aid for Sarah Morris Therapy’s services ("Transaction Data").

Login Data: Sarah Morris Therapy does not collect login data. Login Data does not include the content of any messages sent or received by users or the content of any counseling goals.

Counseling Session Data: Sarah Morris Therapy collects, uses, and stores certain general data regarding user counseling sessions such as whether a live session has been scheduled by the user, whether a Counselor or user joins a scheduled session, when a counseling session began and ended, and whether a counseling session was cancelled or re-scheduled. This is held on a pragmatic tracker until such date as the client requests removal of all data.

Customer Data: Sarah Morris Therapy collects, uses, and stores certain data from users that have signed up for Sarah Morris Therapy’s services such as a user’s self-reported name or nickname, age, e-mail address, phone number, and emergency contact information ("Customer Data").

Communications Data: Sarah Morris Therapy collects, uses, and stores communications between users and Counselors on the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, and communications between users and Sarah Morris Therapy’s customer service team ("Communications Data").

Protecting this information is important for us. Other than in the ways detailed in this Privacy Policy, we will never use or disclose any information unless you requested or approved us to do so.

Purposes for Which Information Is Used

We may use the information we collect for one or more of the following purposes:

Communication with you

To contact you or provide you with information, alerts and suggestions that are related to the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

To verify your identity.

To complete an activity you requested, such as register for the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform or obtain more information.

To reach out to you, either ourselves or using the appropriate authorities, if we have a good reason to believe that you or any other person may be in danger or may be either the cause or the victim of a criminal act.

Delivery of services to you

To create your account on our Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform and let you log in to your account and use the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

To manage your account, provide you with customer support, and ensure you are receiving quality service.

For billing and transaction processing purposes.

To match users with Counselors and facilitate the Counselor Services.

To provide, support, personalize, and develop our Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform and the Counselor Services.

Administration and improvement of services

To supervise, administer and monitor the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

To measure and improve the quality, effectiveness, and delivery of our services.

Compliance with law

To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

To comply with applicable laws, including, but not limited to laws related to protecting client and public health and safety.

To allow therapists to comply with the licensure, legal and quality requirements in their jurisdictions.

Other uses with consent

Any other purpose with your consent.

Purposes for Which Information Is Disclosed to Third Parties

Information about you may be disclosed to third parties for one or more of the following purposes:

For business purposes: Only as necessary for facilitating the Counselor Services, we may share a user’s information with a Counselor and a Counselor’s information with a user. We also may share information with professional advisers, such as auditors, law firms, and accounting firms.

With your direction or consent: We may share your information with third parties if you request or direct us to do so.

With affiliates within our corporate group: We may share your information with any subsidiaries or parent companies within our corporate group.

Compliance with law: We may share your information with a court, a regulatory entity, law enforcement personnel, or pursuant to a subpoena, to comply with applicable law or any obligations thereunder.

In the context of a transaction: We may share your information in connection with an asset sale, merger, bankruptcy, or other business transaction.

For other business reasons: We may share your information to enforce any applicable Terms and Conditions and Terms of Use, and to ensure the safety and security of the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform and our users.

Note that if you make any information publicly available on the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, anyone may see and use such information.

Security of Information

While using any Internet-based service carries inherent security risks that cannot be 100% prevented, our systems, infrastructure, encryption technology, operation and processes are all designed, built, and maintained with your security and privacy in mind. We apply industry standards and best practices to prevent any unauthorized access, use, and disclosure. We comply with all applicable laws, and regulations regarding data privacy.

Service Providers

We may employ third-party companies and individuals to facilitate our Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, to perform certain tasks which are related to the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform, or to provide audit, legal, operational, or other services for us. These tasks include, but are not limited to, customer service, technical maintenance, monitoring, email management and communication, database management, billing and payment processing, reporting and analytics. We will share with them only the minimum necessary information to perform their task for us and only after entering into appropriate confidentiality agreements.

Children's Privacy

We do not knowingly collect or solicit any information from anyone under the age of 16 or knowingly allow such persons to become our user. The Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform is not directed and not intended to be used by children under the age of 16. If you are aware that we have collected Personal Information from a child under age 16 please let us know by contacting us and we will delete that information.

Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose information necessary or appropriate to protect the safety of the public or any person, to respond to claims and legal processes (including but not limited to court orders), and to prevent or stop activity that may be illegal or dangerous. You should also be aware that Counselors may be obliged to disclose information to law enforcement or other authorities to conform to their professional and legal responsibilities. Specifically, and without limitation, you should be aware that the law requires mental health professionals to disclose information and/or take action in the following cases: (a) reported or suspected abuse of a child or vulnerable adult; (b) serious suicidal potential; (c) threatened harm to another person; (d) court-ordered presentation of treatment; (e) on the report of Female Genital Mutilation.

Changes to the Privacy Policy

We may update this privacy statement at our sole discretion. The date of the last revision of this policy appears at the end of this page. We encourage you to periodically review this page for the latest information on our Privacy Policy and practices. Regardless of changes to our Privacy Policy, we will never use the information you submit under our current privacy notice in a new way without first notifying you and giving you the option to stop using the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

Contacting us

If you have any questions or concerns about this Privacy Policy or our privacy-related practices, please contact us by clicking the "Contact" link on any page in our website.

General Data Protection Regulation (GDPR) and UK General Data Protection Regulation Notice

This section provides additional information about our Privacy Policy relevant to users from the European Union (EU), United Kingdom, and Switzerland (together “European Area Countries”). It supplements and should be read in conjunction with the rest of the Privacy Policy. Under the European Area Countries’ privacy laws, Sarah Morris Therapy is the Controller with respect to your personal information.

Sarah Morris Therapy may use your personal information:

When it is necessary to do so to perform our obligations in accordance with any contract that we may have with you, for example to manage your account, and to respond to inquiries about your use of the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform.

When it is in our legitimate interests or a third party's legitimate interests to use personal information in such a way to ensure that we provide the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform in the best way that we can. In particular, we have a legitimate interest in using your personal information for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform. We only rely on our or a third party's legitimate interests to process your personal information when these interests are not overridden by your rights and interests.

When it is necessary to do so to comply with any legal obligations imposed upon us, for example under applicable law.

In rare instances, when it is a medical emergency, we may use your personal information to protect your or another’s vital interests if consent is not a reasonable option.

When you have consented to the use of your personal information, for example for marketing purposes or to track your online activities via Cookies and similar technologies.

Sensitive Data Clause

About sensitive personal information:

Sarah Morris Therapy may also collect and process certain categories of personal information, which legally may be considered “sensitive personal information,” based on (1) health and social care, (2) our establishment, exercise, or defense of a right or legal obligation, or (3) substantial public interest. Sensitive personal information that we process includes your racial or ethnic origin, religious or philosophical beliefs, and data concerning your health or about your sex life or sexual orientation.

When you begin to use our services and register your account, we ask you to provide answers to a questionnaire to customize the service and to provide therapy and related services to you. In providing your responses to the questionnaire you may provide us with “sensitive personal Information” as described above. You may also continue to share such data with us as you receive services. This data allows us to continue providing services to you and customize our services for you. We may also use this information to improve our service and understand how you interact with the services.

Sarah Morris Therapy will:

Use your sensitive personal information to provide you with our services and conduct the processing described above;

Share your personal information, including sensitive personal information, with counselors to provide you with our services, and with other third parties (such as vendors that enable us to provide you services, lawyers, and auditors), subject to us entering into written agreements with them which require them to implement and maintain appropriate safeguards to manage your personal information.

How We Obtain Your Personal Information

Sarah Morris Therapy obtains the categories of personal information listed above from the following sources:

Directly from you. For example, information when you apply to be a counselor or that you submit during the process of using and paying for our Services.

Indirectly from you. For example, through your actions on our website.

Your Rights and Choices

EU, UK, and Swiss residents have specific rights regarding their personal information. This section describes your rights if you are resident in the EU, UK, or Switzerland, and explains how to exercise those rights.

Right of access: You may be entitled to ask us for a copy of any personal information which we hold. This right is known as a ‘Subject Access Request.’ We will normally send you a copy of the personal information within one month of your request. However, that period may be extended by two further months where necessary, taking into account the complexity of the request or the difficulty in accessing the personal information that you request. There is usually no charge. In exceptional circumstances, we may charge a reasonable fee after discussing the fee with you.

Right to rectification: If the personal information we hold about you is inaccurate, you may request rectification. The personal information will be checked, and, where appropriate, inaccuracies will be rectified.

Right to erasure: In certain circumstances, you may be entitled to ask us to erase your personal information.

Right to data portability: In certain circumstances, you may wish to move, copy, or transfer the electronic personal Information that we hold about you to another organization.

Right to object: You may object to your personal information being used for direct marketing. You may object to the continued use of your personal information in any circumstances where we rely upon consent as the legal basis for processing it. Where we rely upon legitimate interests as the legal basis for processing your personal information, you may object to us continuing to process your personal information, but you must give us specific reasons for objecting. We will consider the reasons you provide, but if we consider that there are compelling legitimate grounds for us to continue to process your personal information, we may continue to do so. In that event, we will let you know the reasons for our decision. In some instances, objecting to certain processing may impact our ability to provide you with services.

Rights related to automated decision-making including profiling: We use limited personal information to operate the Pragmatic Tracker Password and Second Verification Encrypted Pragmatic Tracker Password and Second Verification Encrypted Platform and to carry out certain profiling activities to support and grow our business. When doing so, we rely upon our legitimate interests as the lawful basis for processing your personal information and you may exercise the above rights if you do not wish us to process your personal information in this way.

To exercise the rights in relation to your Personal Information set out in this section, please contact us at adminBFTB@protonmail.com

International Data Transfers

As a part of our standard business practices, we may transfer your personal data to organisations based in countries that have not been granted an adequacy decision under the General Data Protection Regulation.

Where data is transferred to such countries, we shall ensure that specific safeguards or derogations have been established.

These might include where the data transfer is necessary in order to fulfil a contract between us and yourself, where we have received your specific consent after having made you aware of any risks involved, or where contracts are in place between us and the third-parties involved that ensure the recipient organisation has a suitable standard of data protection in place.

You can contact our Data Protection Officer with questions, about this policy, or about your personal information by writing to:

Whilst we will always work with you to resolve any concerns you have about the use of your personal information, under GDPR you have the right to lodge a complaint with the supervisory authority in your country of residence if you have any concerns about our use of your personal information.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at adminBFTB@protonmail.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

Last Updated and Effective: 11/08/2022

If you are in a crisis or any other person may be in danger - don't use this site. Call 999 immediately and seek assistance.