

## **OWEN LEWIS INSPIRATIONAL COACHING & HYPNOTHERAPY - PRIVACY POLICY**

### 1. Introduction

Owen Lewis Inspirational Coaching & Hypnotherapy (“we,” “us,” “our”) is committed to protecting and respecting your privacy.

This Privacy Policy sets out how we collect, process and protect any information that you provide when you use the website ( [www.owenlewishypnotherapist.co.uk](http://www.owenlewishypnotherapist.co.uk)) or engage in our Hypnotherapy, NLP and coaching services. This policy therefore applies to the website and all services offered by us.

Our website contains links to third-party websites that are not subject to this Privacy Policy. Please refer to our published Terms and Conditions for further information on links to third party websites.

We reserve the right to change this policy at any time by updating this page. Please ensure you check this page from time to time to ensure that you are happy with any changes.

By using this website, entering personal information, arranging or engaging in our hypnotherapy services we provide you indicate acceptance of this privacy policy.

Should you have any questions regarding any aspect of this policy or how it affects you, please contact us.

This policy was last updated on and is effective from 12<sup>th</sup> June 2018.

### 2. Information About Us

We are Owen Lewis Inspirational Coaching & Hypnotherapy, a trading name of Owen Lewis. We operate the website <http://www.owenlewishypnotherapist.co.uk>. Our practice address where you can contact us is: Owen Lewis Inspirational Coaching & Hypnotherapy, Aizlewood’s Mill, Nursery Street, Sheffield, S3 8GG. You can also contact us by telephone: 07985206077; email: [info@owenlewishypnotherapist.co.uk](mailto:info@owenlewishypnotherapist.co.uk); or using the [contact form](#) on our website.

### 3. Personal Information We Collect

#### (a) [electronic and manual]

Name; date of birth; age; address; telephone number(s); email address(es); appointment dates; payment amount; method of payment and payment dates; presenting issue; referral source; relevant information and details relating to your presenting issue and treatment you choose to provide to us as part of your via electronic means (for example, email or text message) between sessions

#### (b) [manual]

Relevant information and details relating to your presenting issue and treatment you choose to provide to us as part of your Hypnotherapy, NLP or coaching sessions or via other electronic means between sessions

### 4. Lawful Basis for Storing Information

We will hold data about you and process this according to data protection laws, on the following basis:

#### (a) Consent

We collect information where you have consented for us to do so.

This will include information relevant for the provision of all relevant Hypnotherapy, NLP or Coaching services to you.

Your data we collect on the basis of consent is as follows:

All information from 3. (a) and (b) above.

#### (b) Legitimate Interests

(i) We collect information process this where this is necessary for our legitimate business interests.

Your data we collect for this purpose is as follows:

From 3 (a) above: name, date of birth, age, address, free consultation and initial consultation appointment dates, payment amount, method of payment and payment dates, presenting issue, and referral source

(ii) We process data where this is necessary for the provision of effective Hypnotherapy, NLP or Coaching services.

Your data we collect for this purpose is as follows:

All included under 3 (a) and (b) above.

## 5. How We Collect Your Data

When you contact us using the website contact form:

We may collect your email address and name and any other relevant information you have provided in your message.

When you contact us using our third party booking partner:

Name, email address, telephone number, presenting issue details.

When we provide a free consultation appointment to you:

Appointment date.

In person at your free consultation appointment or introductory consultation:

Name, appointment date, relevant information relating to your presenting issue you provide to us, referral source.

In person at your sessions:

Name, appointment date, relevant information relating to your presenting issue, progress and treatment, payment amount, method of payment and payment dates.

When you contact us by email, phone or text whilst you are actively engaged in treatment:

Relevant information relating to your presenting issue, progress and treatment.

When you contact us by email, phone or text whilst you are not actively engaged in treatment:

Name, email address, telephone number, relevant information relating to your presenting issue that you choose to provide and appointment date and time.

## 6. How We Use Your Personal Information

(a) Information collected on the basis of your consent (see 4 (a) above) is used for:

- (i) Identifying you if you contact us by telephone
- (ii) Contacting you (we will only contact you where necessary or appropriate for the provision of Hypnotherapy, NLP or Coaching services to you, to arrange appointments or very occasional communications to mark occasions, request feedback/reviews or marketing)
- (iii) Arranging appointments
- (iv) Providing Hypnotherapy, NLP or Coaching services to you

(b) Information collected on the basis of legitimate interests (see 4 (b) above) is used for:

- (i) Accounting
- (ii) Internal business analytic purposes to improve our website, to monitor our performance, to better understand the needs of potential clients, to improve our service, to target general marketing methods, content and locations
- (iii) Complying with the requirements of professional association memberships for the purposes of client redress and professional standards

## 7. How Long We Keep Your Personal Information

(a) Where information is processed based on your consent (see 6 (a) above) we will store this for a period necessary for the purposes for which it was collected, as outlined in this privacy policy.

(b) Where information is processed based on legitimate interests:

For the purposes of 6(b) (i) and (ii) above, we will continue to store and process this information for as long as is necessary for the original purposes for which it was collected

For the purposes of 6(b) (iii) above, we will continue to store and process this information for seven years from the date of the client's last contact, or if the client is a child, until his/her 25th birthday or 26th birthday if the client was seventeen years old when the treatment ended

#### 8. Where Your Personal Information Is Processed

Your personal information is only stored and processed by us within the United Kingdom.

#### 9. How We Protect Your Personal Information

We can assure you that we take protection of all personal information you provide as a matter of the utmost importance.

We do not store any of your credit/debit card details.

#### 10. Who We Share Your Personal Information With

We do not usually share your personal information with any third parties.

The only circumstance where this would be required is through legal order or where a client seeks redress through a professional organisation and the professional organisation seeks information to be able to resolve this.

Anonymised information (i.e. not your name but your payment date, amount and method of payment) is shared with our accountant who is a trusted third party.

#### 11. Your Rights Regarding Your Personal Information

(a) For information processed on the basis of your consent (see 6 (a) above):

You can withdraw your consent at any time for us to hold and process the above data relating to you. To do so, please inform us in writing, including by email.

(b) For information processed on the basis of your legitimate interests (see 6 (a) above):

We can no longer process your personal information where you object to the processing of your data, and there is no overriding legitimate interest to continue this processing.

You also have the right to request erasure of personal information where we are processing the personal data for direct marketing purposes and you object to that processing.

Specifically, under the GDPR, you have the following rights:

*The right to be informed*

This is the purpose of the Privacy Notice.

*The right of access*

This is usually free of charge

*The right to rectification*

If we hold any incorrect or incomplete personal information you have a right to have this corrected or rectified.

*The right to erasure*

This is also known as the 'right to be forgotten' and applies in certain circumstances (see above).

*The right to restrict processing*

This applies under certain circumstances as specified by the GDPR and outlined by the Information Commissioners Office (please see: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>)

### *The right to data portability*

This gives you the right to receive personal data you have provided in a structured, commonly used and machine readable format. It also gives you the right to request that a data controller transmits this data directly to another controller.

### *The right to object*

You have the right to object to:

- (i) processing based on legitimate interests
- (ii) direct marketing
- (iii) processing for purposes of scientific/historical research and statistics

We will comply with (i) above unless we have legitimate overriding grounds for continuing the processing or the processing is for the establishment, exercise or defence of legal claims.

We will comply with (ii) above when we receive an objection.

We do not process your personal information for the purposes as outlined in (iii) above.

Rights in relation to automated decision making and profiling.

We do not process your personal information in automated decision making or profiling.

You have the right to request a copy of any information about you that we hold, and also to have that information corrected if it is inaccurate. Please contact us at Owen Lewis Inspirational Coaching & Hypnotherapy, Aizlewood's Mill, Nursery Street, Sheffield, S3 8GG; or email: [info@owenlewishypnotherapist.co.uk](mailto:info@owenlewishypnotherapist.co.uk).

If we make a decision not to action any such request, we will explain to you the reasons for this.

If you are not satisfied with the way any complaint you make in relation to your personal information is processed by us then you may be able to refer your complaint to the relevant data protection regulator. In the UK, this is the Information Commissioner's Office.

## 12. How We Use Cookies

A cookie is a small file which asks permission to be placed on your device. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Our website uses Google Analytics as a statistical tool to gather information in order for us to analyse the use of the website. Google Analytics stores this information as a cookie on the visitors computer. The statistical information generated by Google Analytics relating to our website is used to create internal reports to help improve the content and user experience of our website. Google's privacy policy regarding Google Analytics is freely available at:

<http://www.google.com/privacy/privacy-policy.html>

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.