

Privacy Policy: Processing Your Personal Information

1. Who has responsibility for your data

The table below shows you who is controlling and processing your data- the persons/organisations known as 'data controllers' and 'data processors' under the GDPR (General Data Protection Regulation (EU) 2016/679). All data controllers and data processors are required to process data in accordance with the GDPR, as adopted into law of the United Kingdom in the Data Protection Act 2018. If we engage with a data processor who is administered from a country outside of Europe, we will have a contract in place to ensure your information is adequately protected.

Joint Data Controllers			Data Processors
Parties who have <i>joint</i> responsibility for determining the purposes for which, and the manner in which, any personal data are, or are to be, processed.			Additional parties who have access to, and process, your data
1) The Purple House company with whom you are contracting with (or making enquiries with) Purple House Limited (founding clinic- Loughborough) <u>or</u> other limited company licensed to operate a Purple House clinic based in another geographical location (franchised clinic)*	2) Purple House Franchising Limited Who licences the operation of franchised clinics	3) Any sub-contractor e.g. a self-employed clinician, an external clinical supervisor, a solicitor, an accountant	4) Third party software providers e.g. practice management software, bookkeeping software, cloud storage/email providers, outcomes software

* The name of the company with whom you are contracting with will be stated on any terms and conditions / other contractual agreement you have been provided with. Company details can also be found on the webpage dedicated to each clinic locality (if you are not clear, please contact us at Purple House Franchising Limited: 01509 816693).

2. Why we collect information and lawful basis

As part of the process of engaging with Purple House (including at the stage of making speculative enquiries), you may be asked to provide us with 'personal data' or 'special category data' (more sensitive data) as defined by the GDPR. This data may be provided via contact form on our website, via email, in writing, over the telephone or in person. Sometimes the subject of the data will differ from the person providing the information e.g. if a parent/professional has referred a child. You providing us with your data is necessary for the performance of our contract with you or because we need to carry out specific steps before we can contract with you e.g. provide you with a quote. Providing there is a legitimate reason for us to do so, we will use your data to contact you during the course of your contract with us, prior to any contract commencing or after it completes.

The appendix provides further information about why we process personal or special category data and the lawful basis for each purpose. To understand if each purpose is relevant for you, please refer to the column entitled 'data subjects'.

3. Keeping your information safe

Personal information and sensitive information may be processed and stored in several physical and digital locations, including in third party software (e.g. practice management software). We take steps to ensure that these physical and digital locations are secure so that your data stays safe. We also ensure that any transfer of data is undertaken securely and safely. After set retention periods, data is securely destroyed.

4. Sharing Information

As described in section 1, various companies and organisations are involved in the processing of your data as Data Controllers or Data Processors. When sharing your information with other third party individuals or organisations, we will usually seek your explicit consent. However, we may disclose your personal data/sensitive personal data *without* your consent if:

- we are required to by law, e.g. when a court order is in place.
- the information is already in, or comes into, the public domain.
- it is necessary to ensure the safety of any person/s.
- it is in the public interest.

5. Your rights

Under the GDPR, you have the following rights relating to the data we hold about you. There are some circumstances in which the rights may not apply. Please consult with the Information Commissioner’s Office website for more information <https://ico.org.uk/>.

- Right to be informed about the collection and use of your personal data.
- Right to access your information (you will need to make a ‘Subject Access Request’ to the company Purple House company with whom you have contracted).
- Right to have inaccurate personal data rectified, or completed if it is incomplete.
- Right for erasure- to request that information held about you is erased.
- Right to restrict or suppress the processing of your data (it will still be stored).
- Right to ‘data portability’. This gives you the right to receive your personal data in a structured, commonly used and machine readable format. It also gives you the right to request that a controller transmits this data directly to another controller (providing this is technically feasible).
- Right to object to us processing your data for marketing purposes.
- Rights related to automated decision making (although we do not in fact use this as a method of data processing).

5. How long we keep your information

We will not retain your data for longer than necessary. We have specified retention periods for the information we process. This varies depending on what the data relates to. Retention periods for key areas of business are listed below. Please contact us if you require retention periods for any other circumstances. We may retain data for other time periods if legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or to enforce our terms and conditions.

<i>Type of record</i>	<i>Retention period</i>
Records relating to the provision of psychological services to a specific client, normally in the form of a structured clinical record. This may include personal data and special category data about: clients, family members, appointers (referrers), payor of services, professionals linked with the client, employees or sub-contractors.	20 years from the date of last contact, or in the case of children until their 25 th , whichever is the longer period. Retention period for records of deceased persons is 8 years after death.
Records relating to an enquiry about psychological services where a service is not subsequently delivered	6 months from the date of the enquiry
Records relating to workers (employees or sub-contractors)	6 years from the date of termination of contract
Records relating to an enquiry from a prospective employee/sub-contractor who does not subsequently work with us	6 months from the date of the enquiry
Records relating to financial transactions	20 years

6. Information about our website

The Purple House website is owned by the founding clinic, Purple House Limited. The owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements for user privacy. Our website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors. Our website may contain links to websites that are not operated by us. These are provided for your reference only and do not imply that we in any way endorse the activities or third parties. We have no control over these websites/third parties or their data practices.

7. Queries and complaints-contacting us

Should you have any queries/complaints about the processing of your data, in the first instance, please contact the Clinical Director of the Purple House company with whom you are contracting with: <https://www.purplehouseclinic.co.uk/contact-us-find-us/>. If your query/complaint is not resolved at this level, please contact Purple House Franchising Limited either by telephone: 01509 816693 or by post: Viking Court, Shepshed Road, Hathern, Leicestershire. If your query/complaint is still not resolved, you may wish to contact The Information Commissioner's Office, <https://ico.org.uk/>. This is the UK's independent authority set up to uphold information rights in the public interest.

8. Privacy notice updates

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes.

Appendix: Purpose and Lawful Basis of Data Processing

Specific purpose of data processing	Type of data processed	Data subjects	Lawful basis (each legal basis as defined by GDPR is underlined)
To enable the delivery of and administration of professional psychological services to clients	Personal data e.g. name, address, date of birth, phone number, email	Clients Family members Appointers (referrers) Payor of services Professionals linked with the client	To enable fulfilment of our <u>contract</u> (or because we need to carry our specific steps before entering into a contract)
To enable the delivery of and administration of professional psychological services to clients	Special category data e.g. information about health/mental health (in additional to ordinary personal data)	Clients Family members	To enable fulfilment of our <u>contract</u> (or because we need to carry our specific steps before entering into a contract) and <u>the provision of health care services pursuant to contract with a health professional</u>
To statistically analyse information about clinical presentations	Special category data e.g. information about health/mental health (in additional to ordinary personal data)	Clients	For the legitimate interests of the company, specifically for planning service provision
For the purposes of clinical supervision, or to fulfil professional obligations or to meet recognised professional standards in care	Special category data e.g. information about health/mental health (in additional to ordinary personal data)	Clients Family members Any member of the general public	For the <u>legitimate interests</u> of the company, specifically to fulfil professional obligations and recognised standards of care, and for <u>the provision of health care services pursuant to contract with a health professional</u>
To collate client outcome data	Special category data e.g. information about health/mental health (in additional to ordinary personal data)	Clients Family members	For the <u>legitimate interests</u> of the company, specifically for the improvement of services, and for <u>the provision of health care services pursuant to contract with a health professional</u>
To obtain client feedback	Personal data e.g. name, age, address, phone number, email	Clients Family members Appointers (referrers)	For the <u>legitimate interests</u> of the company, specifically for improvement of services
To collect payments for services rendered	Personal data e.g. name, address, phone number, email, bank details	Clients Family members Appointers (referrers) Payor of services	For the <u>Legitimate interests</u> of the company, specifically to obtain payment of services rendered
To make payments for services supplied	Personal data e.g. name, address, phone number, email, bank details	Employees Sub-contractors Suppliers	To enable fulfilment of our <u>contract</u> (or because we need to carry our specific steps before entering into a contract)

For book-keeping and accounting purposes and to maintain records of financial transactions	Personal data e.g. name, address, phone number, email, bank details	Clients Family members Appointers (referrers) Payor of services Employees Sub-contractors Suppliers	<u>Legal obligations</u> (tax purposes)
For communicating important information about the operation of our services.	Personal data e.g. name, address, phone number, email	Appointers (referrers) Professionals linked with the client Employees Sub-contractors Franchisees	<u>Legitimate interests</u> , specifically to communicate important information about our services
For recruitment and to manage human resources	Personal data e.g. name, address, phone number, email, qualifications, employment history, insurance details	Employees Sub-contractors	To enable fulfilment of our <u>contract</u> (or because we need to carry our specific steps before entering into a contract) and, For our <u>legitimate interests</u> (to ensure professional standards in qualification and in indemnity insurance are met)
For recruitment	Special category data (health/mental health), criminal offense data and other forms of personal data	Employees Sub-contractors	<u>Legal obligations</u> (in respect to criminal record checks and health/disability)
For administering the licence to franchised clinics	Personal data e.g. name, address, phone number, email, qualifications, employment history, insurance details, limited company details, bank account details	Franchisees	To enable fulfilment of our <u>contract</u> (or because we need to carry our specific steps before entering into a contract)
For informing the public about the credentials of our clinicians	Personal data e.g. name, address, phone number, email, qualifications, employment history, insurance details, photographs	Employees Sub-Contractors Franchisees	For our <u>legitimate interests</u> (to inform the public about who is involved in the delivery of our services)
For the purposes of marketing	Personal data e.g. name, address, date of birth, phone number, email	Clients Family members Appointers (referrers) Payor of services Employees Sub-contractors Suppliers	We would gain <u>consent</u> to use data in this specific way. Children aged 13 years or over can give their own consent.