

Phoenixology Ltd's Website Privacy Policy

Hello there!

Thank you for checking out our privacy policy. At Phoenixology Ltd we take our client's privacy seriously. We're committed to protecting your privacy and handling your information in a responsible way while you use our website and services. We want you to understand that this is a safe place for you to discuss your feelings and concerns, and we operate in a highly confidential environment. This policy sets out how data is collected and processed through the use of our website and when you use our services.

We encourage you to read this policy alongside any other privacy notices we might provide, so you're fully in the loop about how and why we use your information.

Who's in charge of your data?

The controller of your data is Phoenixology Ltd and we can be contacted on:
Email address: phoenixologyltd@gmail.com

Not happy with something?

We're committed to treating your personal data with respect, transparency, and care. If you ever have questions or concerns about how your data is used, we want to hear from you, and we'll do our best to resolve things quickly and fairly. Under the Data (Use and Access) Act 2025, you have the right to raise a complaint about how your personal data is handled. Here's how:

- **Step 1:** Email us at phoenixology@gmail.com with a brief description of your concern. You don't need to use legal language - just tell us what's worrying you.
- **Step 2:** We'll acknowledge your message and respond without undue delay, usually within 10 working days.
- **Step 3:** If you're not satisfied with our response, you can escalate your concern to the Information Commissioner's Office (ICO) at www.ico.org.uk.

What type of data do we collect about you?

'Personal data' is information that identifies you. If we've removed your identity (by making the data anonymous), it won't be classed as personal data. We might collect, use, store, and share various types of personal data about you as follows:

- **Identity details** such as first and last name, username or similar identifier, marital status and title, date of birth and gender.
- **Contact details** such as your billing address, email address and telephone number.
- **Technical information** such as your internet protocol (IP address), your login data, browser type, version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access our website.
- **Financial information** such as your bank account and payment card details.
- **Information about transactions** like details about payments to and from you, and other details of services you have purchased from us.
- **Account details** such as your username, password, purchases made by you, and your interests, preferences, feedback and survey responses.
- **Usage information** about how you use our website and services.
- **Marketing information** such as your preferences on receiving marketing from us, along with your communication preferences.
- **Special Category Data:** Includes information about your health, including information about your existing and previous medical health conditions, medication details, psychiatric history and any other relevant health information to enable us to carry out our services to you. We do not collect any other Special Category Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Consents for Health Data: We require your specific consent to process Special Category Data so, when you submit your details, we will ask you to confirm your consent to this processing.

How do we collect your personal data?

We use different methods to collect data from and about you. The majority of the time, our information is collected directly when you contact us in the following ways:

- When you enquire about and/or apply for our services;
- When you fill in any new client onboarding forms;
- When you complete any forms before or during an appointment;
- Verbally during discussions and therapy sessions;
- Correspondence with us via post, phone, email or otherwise;
- When you create an account on our website;
- When you subscribe to our service or publications;
- When you request marketing communications to be sent to you;
- When you enter a promotion or complete a survey; or
- When you give us feedback or contact us.

Another method we may use to collect data includes the use of automated technologies or interactions, like website cookies or other similar technologies. This includes information about your equipment, browsing actions and patterns and information about your browsing activity.

This data collection helps us to improve user experience, and to gather information about how you use our website. For more information, please refer to our Cookie Policy, which can be accessed here [OUR COOKIE POLICY IS CURRENTLY UNDER CONSTRUCTION, IT WILL BE ADDED HERE AS SOON AS IT IS AVAILABLE]

We may also receive data from third-parties such as:

- Technical information from Analytics providers such as Google, WordPress, Systeme.io
- Advertising networks such as Facebook, Eventbrite
- Search information providers such as Google,
- Publicly available sources, such as Companies House and the Electoral Register.

What happens if you don't provide us with the required data?

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or goods). In this case, we may have to cancel a service or product you have with us but we will notify you if this is the case at the time.

What are the purposes for which we use your personal data?

The purposes for which we will be using your data include:

- To register you as a new client.
- To provide our services and to process and deliver any orders, including: a) to manage payments, fees and charges and b) to collect and recover money owed to us.
- To manage our relationship with you e.g., to notify you about changes to our terms of this privacy policy or to ask you to leave a review and/or take a survey.
- To send you relevant marketing information about our services.
- To enable you to complete a survey.
- To administer and protect our practice and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To deliver relevant website content to you and measure or understand the effectiveness of the content we serve to you.
- To use data analytics to improve our website, services, marketing, client relationships and experiences.
- To make suggestions and recommendations to you about services that may be of interest to you.

We rely on one or more of the following lawful conditions to process your data as outlined above:

- To fulfil our contract with you;
- For our legitimate interests; or
- To comply with legal obligations.

In some scenarios, we'll ask for your consent, especially for collecting sensitive data. We may process your personal data for more than one lawful reason at a time, depending on the specific purpose for which we are using your data. If you'd like more information on the specific legal ground we are relying on, on occasions where we rely on more than one legal ground, please feel free to contact us.

Our Lawful Basis: Recognised Legitimate Interests

We sometimes process your personal data under what's called a "recognised legitimate interest". This is a lawful basis introduced by the Data (Use and Access) Act 2025. This means we use your data in ways that support important public or organisational aims, while respecting your rights and freedoms.

Examples include:

- Helping prevent fraud or misuse of our services
- Supporting safeguarding and professional standards
- Responding to emergencies or protecting wellbeing
- Improving accessibility and inclusion in our resources

We always carry out a balancing test to make sure our interests don't override yours. You have the right to object to this type of processing at any time, and we'll explain your options clearly.

If you'd like to know more or raise a concern, just email us at phoenixology@gmail.com .We're committed to transparency and respectful data use.

Do we use Cookies?

Cookies help make our website work better for you, remembering your preferences and improving your experience. You can control cookie settings in your browser. Cookies make your browsing experience on our site as smooth as possible, because they remember your preferences.

Our website uses cookies to distinguish you from other users of our website. Please refer to our Cookie Policy here to learn more: [OUR COOKIE POLICY IS UNDER CONSTRUCTION – A LINK WILL BE ADDED AS SOON AS IT IS COMPLETE] Please email phoenixologyltd@gmail.com for more information

AI Usage

Artificial Intelligence (AI): We may use AI tools to assist with the provision of our services, including transcription of therapy sessions, data analysis, drafting documents, responding to enquiries, etc. Any AI tools we employ are used in compliance with applicable data protection laws, including the UK General Data Protection Regulation (UK GDPR).

When using AI tools, we ensure:

- Personal data is processed lawfully, fairly, and transparently.
- Data minimisation principles are upheld, meaning we only provide AI tools with the information strictly necessary for the intended purpose.
- Robust security measures are in place to protect your personal data during any processing involving AI tools.
- When using AI tools, we ensure that personal data is retained only for as long as necessary to fulfil the purposes outlined in our policy, after which it is securely deleted or anonymised.

We have listed below the specific AI tools we are using within our business, the purpose, the types of data we are collecting and our legal basis for this processing.

AI Tool Name	Purpose	Types of Data Used	Legal Basis for Processing
<i>Heidi Health AI</i>	<i>To assist with session notes and report writing</i>	<i>Name, date of birth, email address, gender, ethnicity, health information</i>	<i>Explicit consent</i>

For further enquiries on our AI usage or to exercise your rights, please contact us using the details provided in this policy.

Do we use your data for marketing purposes?

If we send you marketing communications and you no longer wish to receive them, you can opt out anytime by contacting us or clicking on the 'unsubscribe' button on our 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 practice).

Do we use third-party links?

Our website might link to third-party websites, tools and apps. Clicking on these links may allow third parties to collect or share your data. We do not control said websites and are not responsible for said websites' privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Do we ever share your personal data?

We take your data's security seriously and only allow certain people to access it. We may share your personal data with the parties set out below for the purposes as stated further above.

- Service providers, acting as processors who provide IT and system administration services.
- Professional advisers including healthcare professionals, lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- If you are referred by your health insurance provider, then we may need to share details about your appointment schedule with your insurer for the purposes of billing and to provide treatment updates.
- As an HCPC-accredited clinician, we are obliged to consult with another mental health professional for supervision purposes. This is to ensure we reflect and improve on our clinical skills. When discussing clients in supervision we only refer to clients by their first name and identifiable information is minimised.
- Sometimes we may need to share details with your GP or a social worker. We will always get your consent prior to doing this. When the information concerns risk of harm to the client or another person then we may need to disclose information about you without your consent for your own safety or for the safety of someone else.
- If you are referred to another psychologist or healthcare professional for specialist care or assessment, your relevant information may be shared with them to ensure continuity of care and appropriate treatment.
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Debt collection agencies in the event that payment is not received for services rendered. This will be done to recover any outstanding debts, and the debt collectors will process your data solely for this purpose.
- We may need to share your personal data with courts, legal representatives, or other relevant authorities for medico-legal purposes. This includes situations where we are required to do so by law, or where it is necessary to protect your vital interests or the interests of another person. We ensure that this data sharing is conducted lawfully and with due regard for your privacy rights.

All of the above third parties have a requirement to respect the security of your personal data. We do not permit them to use your personal data for their own purposes – they are only permitted to process your data for specified purposes in line with our instructions.

Do we ever transfer your data internationally?

Wherever possible, we will not transfer your data outside the United Kingdom and European Economic Area (EEA).

Occasionally we may need to transfer your data outside of the United Kingdom/EEA, but only when we can be sure it is protected.

Some of our external third parties may be based outside the United Kingdom/EEA and so their processing of your personal data will involve a transfer of data outside the United Kingdom.

Whenever we transfer your personal data out of the United Kingdom, we make sure it is protected by at least implementing one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the United Kingdom
- Where we use certain service providers, we may use specific contracts approved by the UK Information Commissioner's Office and the European Commission which give personal data the same protection it has in Europe.

Please contact us if you want further information on the specific process used by us when transferring your personal data out of the United Kingdom.

How secure is your data with us?

We have strong security measures in place to keep your personal information safe. Only authorised individuals who have a need to know are granted access to your data, such as our employees or trusted partners. They will process your data in accordance with our confidentiality terms.

In the rare circumstances that there is a personal data breach, we have procedures in place and will notify you, along with any applicable regulator, when we're legally required to.

Children's Data & Age-Appropriate Design

We're committed to protecting the privacy of children and young people who use our services or access our resources. If our website, services or content are likely to be used by children under 18, we follow the Age-Appropriate Design Code and the updated rules under the Data (Use and Access) Act 2025.

Here's what that means in practice:

- We design our services with children's safety and understanding in mind
- We avoid using unnecessary tracking or profiling tools
- We explain things clearly, using child-friendly language wherever possible
- We ask for parental or guardian consent when needed
- We give children meaningful choices about their data

If you're a parent, guardian, or educator and have questions about how we handle children's data, just email us at phoenixologyltd@gmail.com

Children's Information and Consent

We work with children and young people of different ages, and the rules about consent vary depending on age and circumstances.

Age and Consent

- **Under 13:** We always require consent from a parent or person with parental responsibility.
- **Ages 13-15:** We usually require parental consent, though young people may be able to consent themselves if they fully understand the implications (assessed case-by-case).
- **Ages 16-17:** Young people can generally consent to processing of their health data themselves, though we may involve parents/carers with the young person's agreement.
- **Age 18+:** Adults provide consent themselves. We will not share information with parents without explicit consent (except in safeguarding situations).

Verifying Parental Authority

We verify parental authority by:

- Requesting confirmation of relationship to the child
- Checking parental responsibility (we may request documentation such as court orders if parents are separated)
- Confirming with schools or referring professionals where appropriate

When Young People Turn 16 or 18

When a young person turns 16, they gain the right to consent to health data processing. When they turn 18, they have full control over their information. For ongoing cases, we will discuss how to manage consent and communication going forward.

Separated Parents

If parents are separated, both parents with parental responsibility generally have equal rights to information about their child, unless court orders specify otherwise. Please inform us of any relevant arrangements or restrictions.

What is our process for retaining your data?

We only keep your data as long as necessary for the reasons we collected it.

By law we have to keep medical information about patients for 7 years after treatment has finished. For any children we treat, we are obliged to retain the medical information until the child's 25th birthday. By law we have to keep

basic information about our clients (including contact, identity, financial and transaction data) for six years after they cease being patients for tax purposes.

If you contact us with an initial enquiry and share personal details, but do not then become a client, we will delete your personal information after four weeks. If you confirm you do not want to pursue a service within those four weeks we will destroy the information immediately.

For information that does not fall under the definition of basic, to determine the appropriate retention time, we look at what kind of data it is, how sensitive it is, the risks if it's misused, why we need it, and if there are other ways to achieve the same goals. We also consider applicable legal, regulatory, tax, accounting and other requirements.

What are your legal rights in relation to your data?

You have the following rights regarding your personal data:

Access: You have the right to ask us what personal data we hold about you and to receive a copy of that data. This is called a Subject Access Request (SAR).

We'll respond within one calendar month, but if we need to verify your identity first, we may pause the clock while we do so. This helps protect your data and ensures we're sharing it with the right person. If your request is complex or repetitive, we may apply proportionality rules under the Data (Use and Access) Act 2025, which allow us to limit the scope or extend the response time. We'll always explain why and keep you informed. To make a request, just email us at phoenixologyltd@gmail.com with the subject line "DSAR Request". You don't need to use legal language - just let us know what you'd like to see or understand. If you're unhappy with how we handle your request, you can raise a concern with the Information Commissioner's Office (ICO) at www.ico.org.uk

Correction: If the personal data we have about you is incomplete or incorrect, you can ask us to correct it.

Erasure: You can ask us to delete your personal data. It's important to note, however, that there might be legal reasons that prevent us from fulfilling this request. If such reasons exist, we will inform you when you make your request.

Objection: In certain situations, you have the right to object to the processing of your personal data.

Restriction of Processing: You can request that we restrict the processing of your personal data under specific circumstances.

Data Portability: You have the right to request the transfer of your personal data directly to you or to a third party of your choice.

Withdrawal of Consent: At any point where we rely on your consent to process your personal data, you have the right to withdraw this consent. Withdrawal of consent will not affect the legality of the processing done before the consent was withdrawn. Should you withdraw your consent, we might be unable to provide you with certain products or services. We will inform you if that is the case when you withdraw your consent.

If you wish to exercise any of the rights set out above, **please contact us**.

We won't charge any fees for you to request access to your personal data. However, a reasonable fee may be charged if your request is clearly unjustified, repetitive or excessive. We also reserve the right to not comply in this scenario. We try to respond to all legitimate requests within one month. Occasionally it could 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 and keep you updated.

Changes and Contact

We regularly review our privacy policy. Please keep us updated if your personal data changes. If you have any questions or need to exercise your rights, just get in touch.

Thanks for reading our privacy policy. If you have any questions, please don't hesitate to contact us.