

THE FAMILY TREATMENT SERVICE

WEBSITE PRIVACY POLICY

INTRODUCTION

Welcome to The Family Treatment Service Limited Website privacy policy.

The Family Treatment Service Limited respects your privacy and is committed to protecting your personal data. This website privacy policy will inform you as to how we look after your personal data when you visit our website at www.thefamilytreatmentservice.com (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This website privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this website privacy policy.

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1. IMPORTANT INFORMATION AND WHO WE ARE

1.1. Purpose of this website privacy policy

This website privacy policy aims to give you information on how The Family Treatment Service Limited collects and processes your personal data through your use of this website, including any data and personal data you may provide through this website when you become a new client and receive or engage our services in accordance with our client terms and conditions of service and our client consent form and our client privacy notice, to include if you subscribe and sign up to our newsletter to receive news and updates at www.thefamilytreatmentservice.com and www.thefamilytreatmentservice.com/book-now.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this website privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This website privacy policy supplements our other privacy notices and privacy policies and is not intended to override them.

1.2. Controller

The Family Treatment Service Limited is the controller and responsible for your personal data (collectively referred to as the "**Family Treatment Service Limited**" the "**Company**", "**we**", "**us**" or "**our**" in this website privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this website privacy policy. If you have any questions about this website privacy policy, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

1.3. Contact details for our data privacy manager

If you have any questions about this website privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: The Family Treatment Service Limited

Name or title of data privacy manager: Lara Bobak

Email address: info@thefamilytreatmentservice.com

Postal address: 39 Church Road, Wimbledon, London SW19 5DQ.

You have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), this is the UK regulator for data protection issues at (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.4. Changes to the website privacy policy and your duty to inform us of any changes

We will proceed to keep our website privacy policy under regular review. This version was last updated in January 2021.

It is important that the personal data we hold about you is accurate and current and up to date. Please keep us informed if your personal data changes during your relationship and engagement with us.

1.5. Third-party links

This website includes links to third-party websites, plug-ins and applications. We have links to Facebook, Instagram and Outlook/E-mail exchange. By clicking on those links or enabling those connections you may allow third parties to collect or share data about you that may be without your knowledge. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed such as (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the following way:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of services and treatments you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your engagement of services, treatment services made or requested by you, your interests, preferences and feedback.
- Usage Data includes information about how you use our website, treatments and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences, newsletters and updates.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered

personal data in law as this data will not directly or indirectly reveal your identity in any way. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this website privacy policy.

We do not collect Special Categories of Personal Data via our website, Special Categories of Personal Data (includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

We do not collect any information or data about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and if 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, in accordance with our client terms and conditions of service and client consent form and our client privacy notice (for example, to provide you with our services or treatments or to refer you within our group to our healthcare consultants or specialists). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time, we refer you to our client terms and conditions of service available on request.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

3.1. Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms, attending our office location or by corresponding with us by post, phone, email or entering your e-mail address on our website or otherwise. This includes personal data you provide when you book an appointment to see us or book an appointment on-line or with one of our healthcare consultants or specialists within our group and when you:

- book or engage our services;
- book or engage in our treatments;
- subscribe to our service or publications, newsletter and updates;
- request marketing to be sent to you;
- give us feedback or contact us.

3.2. Automated technologies or interactions

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies and we use google analytics. We may also receive Technical Data about you if

you visit other websites employing our cookies. Please see our [cookie policy](#) for further details of this and our cookies used on our website.

3.3. Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:
 - analytics providers such as Google based inside and outside the UK;
 - search information providers based inside or outside the UK.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside and outside the UK.
- Contact, Financial and Transaction Data from Cliniko our case management software and from our web-hosting company Squarespace.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you in accordance with our client terms and conditions of service and client consent form and our client privacy notice.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data please review our glossary below and lawful basis section.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending any direct marketing materials to you to include any third party direct marketing communications to you via email or text message or telephone. You have the right to withdraw consent to such marketing at any time by contacting us. We will also obtain your consent to provide your data to any of our third party healthcare consultants or specialists if this is required, or recommended to assist with your care and treatment, if and when needed however, we will not generally rely on consent to share your data.

4.1. Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for such processing which we are using your data for. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To on-board you as a new client to receive our services in accordance with our client terms and conditions of service and client consent form and client privacy notice via our website by completion of our booking form online.</p> <p>To insert your data into our web-hosting service with Squarespace and our case management software Cliniko.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Services data (d) Financial 	<p>Performance of a contract with you</p>
<p>To process and deliver your treatment on-line or in person at our premises or such office locations as required.</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) To provide treatment to you.
<p>To process and deliver your treatment including:</p> <ul style="list-style-type: none"> (a) Manage payments, fees and charges, such charges may be payable via our website (b) Collect and recover money owed to us. (c) To provide such treatment to you as agreed in our client terms and conditions of service as booked via our website. 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) To provide treatment to you.
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you about changes to this website privacy policy. 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)

		and to study how clients use our products/ services)
To enable you to receive information such as (a) online courses (b) Workshops (c) pre-recorded online content (d) digital paperwork (e) Handouts (f) sale of books including practitioner books, newsletters and updates	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To make suggestions and recommendations to you about our services that may be of interest to you or with your consent at all times, to contact you with regard to direct marketing opportunities that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

4.2. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around direct marketing and advertising of our services. We have a consent notice to obtain your explicit consent to any form of direct marketing for you to complete if required, or you can sign up to our newsletter on our website, if you wish to hear from us in this regard. You can withdraw your consent to our direct marketing activities including our newsletter at any time by contacting us at 39 Church Road, Wimbledon, London SW19 5DQ or by e-mail to info@thefamilytreatmentservice.com.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this direct marketing).

You will receive direct marketing communications from us if you have requested information from us or signed our consent notice or purchased and engaged in our services and you have not opted out of receiving that direct marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or any of our third parties to stop sending you marketing messages at any time by contacting Lara Bobak at lara@thefamilytreatmentservice.com, or you may write to us 39 Church Road, Wimbledon, London SW19 5DQ.

Where you decide to opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service engagement in accordance with our client terms and conditions of service.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see www.thefamilytreatmentservice.com/cookie-policy

Change of purpose

We will only use your personal data for the purposes for which we collected it for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose your data was collected for. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at info@thefamilytreatmentservice.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so and/or we shall update our privacy policies to explain this matter.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may use and share your personal data within The Family Treatment Service Limited group and with our internal and external third parties such as our software providers, payroll company, our healthcare consultants, specialists and any other internal personnel. Our healthcare consultants may provide you with additional information regarding their goods and services. Should you require a list of such third parties please contact our data privacy manager.

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data.

We will share your personal data with any third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this website privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal

data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We may, together with our web-hosting and service providers and case management software company transfer your personal information and data outside the UK. If we do, we will ensure there are appropriate safeguards and measures in place to provide a similar degree of protection for your personal information and we shall:

- ensure that there is an adequacy regulation in accordance with the United Kingdom General Data Protection Regulation ("**UK GDPR**") in respect of those countries upon which your information is being transferred to. This means that the countries to which we may transfer your data are deemed to provide an adequate level of protection for your personal data in accordance with the UK GDPR and Data Protection Act 2018;
- only transfer your personal data to those countries that have been deemed by the Secretary of State to provide an adequate level of protection for personal data;
- upon using certain service providers to include, our web hosting service who have their data servers based in the United States, we shall use specific contracts approved by the Secretary of State and in accordance with the UK GDPR which give protection by putting in place standard contractual clauses ("**SCCs**"), such SCCs can be found at the ICO website of ico.org.uk and at eur-lex.europa.eu for Squarespace;
- use specific contracts such as SCCs approved by the Secretary of State which give personal data such protection in accordance with the UK GDPR for US/UK transfers, such specific contracts can be found at the ICO website of ico.org.uk; and
- upon the UK leaving the European Union and the transitional period under a withdrawal agreement expires before the European Commission has adopted an adequacy regulation for the UK or during any time when a bridging mechanism is in place and has expired in accordance with the EU (Future Relationship) Act 2020 then, the parties hereby agree to enter into the SCCs in accordance with the UK GDPR and agree, where no other appropriate safeguard or exemption applies in accordance with the UK GDPR, that the personal data subject to this agreement (and to which 119A of the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation ((EU) 2016/679) applies) will be transferred in accordance with the SCCs as of that date. The parties agree to use commercially reasonable endeavours to complete the annexes to the SCCs promptly and in any event within 20 days for the purpose of giving full effect to the clauses. If there is any conflict between this agreement and the SCCs the terms of the SCCs shall apply.

Please contact our data privacy manager if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we

limit access to your personal data to those employees, agents, contractors, healthcare consultants, specialists and other internal and external third parties within our group who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our data retention policy which you can request from us by contacting us.

Please note that, by law we have to keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after you cease being a client of the Company for tax purposes.

In some circumstances you can ask us to delete your data: see further information below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice upon or to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us at 39 Church Road, Wimbledon, London SW19 5DQ or by e-mail to info@thefamilytreatmentservice.com.

No fee is usually required to make a subject access request

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

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.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data in accordance with our client terms and conditions of service, where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in The Family Treatment Service Limited's group acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting or who may be our healthcare consultants or specialist therapists.

External Third Parties

- Service providers acting as processors based in the UK who provide IT and system administration services such as our web-hosting service Squarespace, marketing and advertising services that shall send marketing materials and newsletters on our behalf and our software providers such as Cliniko our case management software, our payroll company our healthcare consultants and any other internal personnel. Our healthcare consultants may provide you with additional information regarding their goods and services. Should you require a list of such third parties please contact our data privacy manager or review this on our website.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights

and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.