



# General Privacy Policy for CPPTherapy

Please read carefully, if you do not accept these terms, you are advised not to use this website.

## Privacy Policy

Use of this website, <https://www.cpptherapy.com/>, constitutes your legal agreement to the terms within this policy and your acceptance of this policy is deemed to occur upon your first use of the website.

Sylvia Wingens (CPPtherapy) may change this policy from time to time by updating this page. You should check this page before using the website to ensure that you are aware of and accept any changes.

## Policy Statement

Sylvia Wingens (CPPtherapy) takes a proactive approach to user privacy and takes all reasonable steps to ensure that personal data is safeguarded and kept in accordance with the law. My use of data and how I process it is outlined in this Policy.

This Policy applies to users of the website, clients and customers.

By providing me with your data, you warrant that you are over 18 years of age.

## About Us

Sylvia Wingens (CPPtherapy) is registered with the Information Commissioner's Office (ICO) for data protection reference number (ZA143393). Sylvia Wingens (CPPtherapy) is the data controller for this website. Full details of our notified purposes can be viewed at the website of the Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk). The person responsible for Data Protection is Sylvia Wingens.

## What personal data do we collect?

Information that you provide to me is retained and processed in accordance with UK data protection legislation.

**Contact:** I have Contact Forms which are used to collect your name, email and phone number as well as your message, or other information so that I can contact you and provide details of my services to you, make bookings, confirm bookings and deal with general enquiries. Data is held on the grounds of being legitimate to my business interests and in order to provide my services to you.

**Emails:** I retain copies of emails sent to me on our servers. Your personal information will be held by me in accordance with this Privacy Policy and will be on the basis of being legitimate to our business interests and in order to provide our services to you.

**Phone calls:** Any data relating to phone calls may be retained by me. The data will be held based on being for our legitimate business needs or to fulfil our contractual obligations if you are a client of mine.

**Social media:** I use social media to engage with users and link to our pages on Facebook, Twitter, Instagram, Soundcloud and YouTube. I do not keep any specific data that identifies you as an individual user but hold details of our followers on these platforms. You should refer to the Privacy Policies of these channels to understand how they treat your data in relation to linking to our site.

Facebook: <https://www.facebook.com/privacy/explanation>

Twitter: <https://www.twitter.com/en/privacy>

Instagram: <http://instagram.com/legal/privacy/>

Soundcloud: <https://soundcloud.com/pages/privacy>

If you send me a direct message via social media, the details may be retained by me only as relevant to any ongoing contract or to further my legitimate business interests or as required for legal purposes. The third-party provider may also retain details in accordance with their Privacy Policy.



## Special categories of data

Some of the information you provide to me may be considered sensitive personal data which includes information about the data subjects' ethnic or racial origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life or criminal record.

You may also wish to provide me with sensitive information affecting the data subject's ability to participate in a class (this may be about a child's or person's health for example). We would advise users of this website to send such information by a more secure system such as encrypted email. Sensitive (i.e. special categories of data) personal data will only be processed following your explicit consent.

## How do I use your data?

I may use the information I collect from you when you view my website, or use certain other site features in the following ways:

- To personalise your experience and to allow me to deliver the type of content and product offerings in which you are most interested.
- To improve our website to better serve you.
- To follow up with you after correspondence (email, social media or phone enquiries).

Users contacting this website, and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use. Every effort has been made to ensure a safe and secure email submission process, but I advise users using such forms that they do so at their own risk.

## Third-party disclosure

I do not sell, trade, or otherwise transfer to outside parties your personal data. This does not include website hosting partners and other parties who assist us in operating our website, conducting our business, or serving my users, so long as those parties agree to keep this information confidential. We may also release information when it's release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property or safety.

## Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. Neither this website nor its owners will ever ask for personal or sensitive information through social media platforms. Users wishing to discuss sensitive details should do so through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Use of social sharing buttons is at the user's own discretion. Social media platforms may track and save your request to share a web page through your social media platform account.

## Shortened Links in Social Media

Through their social media platform accounts, this website and its owners may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs (web addresses).

Users are advised to take caution and use good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.



## Data Security

My website is scanned on a regular basis for security holes and known vulnerabilities to make your visit as safe as possible. However, the internet is not completely secure, and we cannot guarantee the security of your personal data transmitted through my website or by email. Any transmission is at your own risk.

Your personal data is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal data. We regularly carry out backups of our data which is stored securely.

All transactions are processed through a gateway provider and are not stored or processed on our servers. See '*payment processing*' section above for further information on our gateway providers.

## Your legal rights

Sylvia Wingens (CPPtherapy) recognises a data subjects rights and will uphold these in accordance with data protection laws. You are entitled to see the information held about you and you may ask me about any of the following:

### Subject access requests

Data subjects (i.e. individuals) have the right to access personal data that is held by submitting a subject access request (SAR) to Sylvia Wingens (CPPtherapy). We will endeavour to respond quickly to any such requests, which legally require us to respond within one month of receiving the request and necessary information. A subject access request can be made by emailing us at company email address.

### Right to rectification

Data subjects have the right to request that we amend or change personal information that is inaccurate or incorrect.

### Right to erasure

Data subjects have the right to ask us to delete personal information from our systems without giving any reason and at any time. We will act on any such request without delay.

### Right to restrict processing

Data subjects have the right to rectification or erasure of personal data in the following circumstances:

- Personal data is not accurate;
- The processing of data is unlawful - data subjects may request that processing is restricted;
- Data is required to exercise legal rights or defend legal claims;
- Data is unlawful but there may be lawful grounds for processing, which override this right.

### Right to data portability

Data subjects have the right to obtain and request the transfer of their data to different service providers.

### Right to object

Data subjects have the right to object to the processing of data at any time based on their particular situation. This includes objecting to profiling unless it is in the 'public interest' or exercised lawfully by an official authority. I will only process data under lawful grounds.



## Using your rights

If you wish to invoke any of these rights, you should contact the person responsible for data protection by emailing us at company email address.

## Important Information Questions and queries

If you have any concerns about how we handle your data, you can contact the Data Controller by email to company email address

## Changes to this policy

We reserve the right to change this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. You will be deemed to have accepted any changes to the terms of the privacy policy on your next visit of the website following the amendment.

## Complaints

If you want to raise a concern about the use of your data, you can contact us by email to [info@cpptherapy.com](mailto:info@cpptherapy.com). Alternatively, you can formally raise a concern or complaint to the Information Commissioner's Office (ICO) directly on 0303 123 1113, or see the options for reporting issues on <https://ico.org.uk/concerns/>

## No Waiver

No failure or delay by us in exercising any of our rights in accordance with this Privacy Policy or our terms and conditions shall be deemed to be a waiver of that right, and no waiver of a breach of any provision of the Agreement shall be deemed to be a waiver of any subsequent breach of the same or any other provision.

## Severance

If one or more of the provisions of this Privacy Policy or our terms and conditions is found to be unlawful, invalid or otherwise unenforceable, those provision(s) shall be deemed severed from the remainder of these terms and conditions and shall remain enforceable.

## Third Party Rights

The terms of this Privacy Policy shall not confer rights on any third parties and accordingly the Contracts (Rights of Third Parties) Act shall not apply.

## Jurisdiction and Governing Law

The terms of this Privacy Policy and all disputes, whether contractual or otherwise, arising out of or in connection with the policy are governed by and shall be construed in accordance with the laws of England and Wales and each party submits to the exclusive jurisdiction of the English courts.

## General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) is concerned with the personal information about you that I collect, store, and share. This page details my GDPR policy.