

## PRIVACY STATEMENT

### **General Privacy Statement**

#### **How we use your data**

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In an effort to protect our clients' and site visitors privacy and rights, we have established a Privacy Policy which explains what information we gather on visitors and what we do with information that we gather.

This Privacy Policy governs the manner in which we collect, use, maintain and disclose information collected from users of this Web site (each, a "User").

#### **Privacy**

Cognitive Therapy Guernsey is committed to protecting your personal data when you use our services and website.

Cognitive Therapy Guernsey complies with the Bailiwick of Guernsey Data Protection Law, 2017. We also comply with GDPR rules and regulations governing the use, storage and management of your data. If you have any queries, please do not hesitate to contact us at [agraycbt@protonmail.com](mailto:agraycbt@protonmail.com). You may also [contact the Data Protection Commissioner of the Bailiwick of Guernsey](#), if you feel that we have been unable to resolve your query to your satisfaction.

This privacy statement relates to our use of any personal data you provide, and contains details of how we collect, use, disclose, transfer and store your personal data in connection with your relationship with us and in particular for your use of our services.

In order to provide you with the most suitable service(s) for your needs, we are required to collect personal data about you. In-dependence is committed to safeguarding your personal data and is registered as a data controller with the Guernsey Data Protection Authority. This means that we are responsible for deciding how we hold and use personal data that relates to you.

Whenever you provide personal data we are legally obliged to use your data for a lawful purpose and the processing must be fair and transparent in line with the Data Protection (Bailiwick of Guernsey) Law, 2017. We are also required under the data protection legislation to notify you of the information contained in this Privacy statement.

It is important for you to read this Privacy Statement, together with any other privacy notice or statement we may provide on specific occasions when we are processing data related to you, so that you are aware of how and why we are using such information.

## PRIVACY STATEMENT

### **Data Protection principles**

Cognitive Therapy Guernsey will comply with data protection law. This means that personal data we hold about you must be:

- Used in a lawful, fair and transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary for those purposes;
- Accurate and kept up-to-date;
- Kept only for as long as necessary for the purposes we have told you about; and
- Kept securely.

### **Data Collection**

We collect personally identifiable information from Users both face to face and through the website (online forms).

We may also collect information about how Users use our Web site, for example, by tracking the number of unique views received by the pages of the Web site or the domains from which Users originate. We use "cookies" to track how Users use our Web site.

### **Use of data processors**

Data processors are third parties who provide elements of our service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

### **Data Usage**

At no time will our database of users ever be sold to any entity for the purpose of marketing or mailing lists. Personal information will not be sold or otherwise transferred to our business partners without your prior consent, except that we will disclose the information we collect to third parties when, in our good faith judgment, we are obligated to do so under applicable laws.

## PRIVACY STATEMENT

### **People who email us**

You need to be aware that any emails you send us may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

### **Specific Privacy Statement for Use of Website**

#### **Browsing**

We collect certain information about your computer and your interaction with the site when you browse [www.cognitivetherapyguernsey.gg](http://www.cognitivetherapyguernsey.gg):

- Your IP address, and details of which version of web browser you used
- Information on how you use the site, using cookies

This data is not personally identifiable and by using the site you are agreeing to this data being collected. It is only used to help us monitor and improve the site (such as making updates to the popular pages buttons on the home page).

#### **Cookies**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies we use and why.

## PRIVACY STATEMENT

Cookie	Name	Purpose
Universal Analytics (Google)	ga _gali _gat_UA-1036645-1 _gid	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website where visitors have come to the website from and the pages they visited. <a href="#">Read Google's overview of privacy and safeguarding data</a>

### How do I change my cookie settings?

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

### **Specific Privacy Statement when accessing Therapeutic Services**

#### **What data will Cognitive Therapy Guernsey collect about me?**

Personal data includes any information about an individual from which that person can be identified. It does not include anonymised data where the identity has been removed.

There are also "special categories" of data of more sensitive personal data that require a higher level of protection.

Access to our services via telephone/web link or in person require different types of information to be submitted. Most of the data we request is of a sensitive nature due to the nature of the work we provide, and may include information relating to health, substance use, employment and relationships. This information is gathered so that we can make decisions about the most suitable service for your situation.

If you are accessing the service through Island Health and are registered with them, personal and sensitive information may be collected through them. Their Privacy Policy applies.

If you are not already registered with Island health, they will require certain personal and possibly sensitive information about you for appointment booking and billing purposes. Their Privacy Policy applies.

#### **How will Cognitive Therapy Guernsey use the data they collect about me?**

Our lawful purposes for processing will fall into one of the following categories, dependent upon the service you are accessing;

Schedule2. Part 2; 10.a.ii. a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if the person were a health professional.

Schedule2 Part 2; 13.b. Where we are exercising a function of the States;

Schedule2 part 2. 14.d. The processing does not involve disclosure of the personal data to a third party without the consent of the data subject;

## PRIVACY STATEMENT

Schedule 2, Part 2, 9. The processing is necessary in order to comply with an order or judgement of a court or tribunal having the force of the law in the Bailiwick.

Where data is obtained from someone other than you, this will be in most circumstances health and social care providers. In these circumstances you will be aware at the point of data collection who we may contact to enable us to complete the necessary work.

Information is only shared if we have a lawful basis for doing so.

From time to time it may be necessary for information to be shared with other professionals involved in your care. This can include, but is not limited to, your GP or other clinicians involved in your care.

### **What if I do not provide personal data to Cognitive Therapy Guernsey?**

We need both personal and sensitive information to be able to provide an effective service. If you do not provide certain information requested, we may be unable to provide you with a service.

### **How long will Cognitive Therapy Guernsey keep my personal data?**

Unless the service you are accessing specifies otherwise personal data will be kept for a minimum period of 7 years post the end of our last formal contact with you.

Data may be kept for longer if, for example, there is a complaint and the data is required as part of the complaints process.

Personal data is held in electronic format, with some data kept in hard copy to enable certain working procedures to occur. Data is destroyed in hard copy once no longer required in that format and in order to minimize the potential for unauthorised access.

In order to prevent unauthorised or unlawful processing, Cognitive Therapy Guernsey has put in place suitable physical, electronic and managerial procedures for both electronic and hard copy data to safeguard and secure the information that is collected and processed.

### **What are my data protection rights?**

It is important the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes whilst you are a client of ours.

In certain circumstances you may have the right to:

- Request access to your personal data (data subject access request). This enables you to receive a copy of the personal data we hold about you;
- Request correction of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected;
- 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 use it.
- Request the restriction of processing of your personal data about you, for example if you want us to establish its accuracy or the reason for processing it; or
- Request the transfer of your personal data to another party.

We will not charge a fee for providing access to your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances. Cognitive Therapy Guernsey may need to request specific information from you to help us to confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is another appropriate security measure to ensure that personal data is not disclosed to any other person who has no right to receive it.

Cognitive Therapy Guernsey complies with the Data Protection (Bailiwick of Guernsey) Law 2017. Personally identifiable information we receive about you via [www.cognitivetherapyguernsey.gg](http://www.cognitivetherapyguernsey.gg) will not be disclosed to any third party without your prior consent or the requestor's demonstrated legal authority to receive it. If you are referred by your GP at Island Health, information may be shared with your GP.

## PRIVACY STATEMENT

If you are seen within the Island Health surgeries, your appointment date and time will be shared with them via their appointment booking system. Your personal information will also be shared with them for billing purposes. Their Privacy Policies are applicable here.

If your appointment is taking place via remote video call, an email will be sent to you with a link to a GoToMeeting secure video call. The GoToMeeting Privacy Policy is applicable. By using this application you are consenting to the terms. If you are unable to use the application, it will not be possible to offer you a remote therapy session.

We won't share your information with any other organisations for marketing, market research or commercial purposes, and we don't pass on your details to other websites.

The author reserves the right to update this policy at any time. It is your responsibility to ensure you have read and understood this policy.

This policy was last updated on 26th June 2021.