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PRIVACY POLICY  
Version 1

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## 1. INTRODUCTION AND TERMS

Cornerstone Counselling (South West) LLP (“We “or “us”) are committed to protecting and respecting your personal data and privacy. This privacy policy relates to our use of any personal data we collect from you from any of our services. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data; including the Data Protection Act 1998 (DPA) and The General Data Protection Regulation 2016 (GDPR) together, and with other subsequent laws “**Data Protection Laws**”.

## 2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 For the purpose of the Data Protection Laws, the data controller is Cornerstone Counselling (South West) LLP, registered company number OC396068. If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Privacy Officer  
Cornerstone Counselling (South West) LLP  
28 South Street  
Wellington  
Somerset  
TA21 8NS

Email: [privacy@cornerstonesw.co.uk](mailto:privacy@cornerstonesw.co.uk)

Telephone: 01823765065 and ask to speak to the Privacy Officer

## 3. YOUR RIGHTS

Under the Data Protection Laws your rights are:

- 3.1 **To be informed** – We must make available this privacy notice with the emphasis on transparency over how we process your data.
- 3.2 **Access** – You are entitled to find out what details we may hold about you and why.
- 3.3 **Rectification** – We are obliged to correct or update your details.
- 3.4 **Erasure** – This is also known as the request to be forgotten.
- 3.5 **Restrict processing** – You have the right to ‘block’ or suppress the processing by us of your personal data.
- 3.6 **Data portability** – You have the right to obtain and reuse your personal data that you have provided to us.
- 3.7 **Object** – You have the right to object to us processing your data in relation to direct marketing and or profiling.
- 3.8 **Rights in relation to automated decision making and profiling** – We do not use automatic decision making or profiling.

#### 4. **THE DATA WE COLLECT ABOUT YOU**

- 4.1 We collect and process Personal Data. Typically the Personal Data we collect and process will include name, address, phone numbers and an email address but we may collect and/or process other Personal Data from time to time. It also may include IP address and cookies of your visit to websites.
- 4.2 In order for us to provide effective therapeutic services to you, we collect and process Sensitive Personal Data. The Sensitive Personal Data we collect will include the name of your GP, your surgery address, and details of any medication you may be prescribed which would be of relevance to your therapeutic treatment. We always treat any sensitive data we process with the greatest care, and in accordance with the Data Protection Regulation.
- 4.3 We only collect data from you directly or via third parties (see Third Parties below).

#### 5. **HOW YOUR DATA WILL BE USED**

- 5.1 We use information held about you to:
  - 5.1.1 provide you with information and services that you request from us or which we feel may interest you (where you have consented to be contacted for such purposes or by Legitimate Interest);
  - 5.1.2 carry out our obligations arising from the therapeutic contract entered into between you and us;
  - 5.1.3 establish the authenticity of the contact data you have provided by initiating appointment confirmation by various methods, including but not limited to SMS message, WhatsApp, Email, telephone call.
  - 5.1.4 notify you about changes to our services
- 5.2 We also embrace the use of social media and may wish to process any comments made public by you. This is carried out with your express permission, and on an anonymised basis

#### 6. **THIRD PARTIES**

- 6.1 We will keep your information within the organisation except where disclosure is required or permitted by law or when we use third party service providers (data processors) to supply and support our services to you. We have contracts in place with our data processors. This means that they cannot do anything with your personal data unless we have instructed them to do so. They will not share your personal data with any organisation apart from us. They will hold it securely and retain it for the period we instruct.
- 6.2 Please see below the list which sets out the categories of recipients of personal data.

<b><i>SERVICE PROVIDED</i></b>
<i>IT Support Services</i>
<i>Email Provider</i>
<i>Banks</i>
<i>Telephone Services Provider</i>
<i>Accountants</i>

6.3 In addition third parties may provide us with Personal Data and they should only do so where the law allows them to.

## 7. **WHERE YOUR DATA IS HELD**

7.1 Any digital data that contains your Personal Data is stored within the UK.

7.2 In operating our website it may become necessary to transfer data that we collect from you to locations outside of the EEA for processing and storing. By providing your personal data to us, you agree to this transfer, storing and processing. We do our utmost to ensure that all reasonable steps are taken to make sure that your data is stored securely.

## 8. **LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

8.1 All personal data which we collect must be fairly and lawfully processed, Data Protection Regulation allows us to process the information we hold as we regard it as being in Cornerstone's legitimate interest in order to effectively carry out therapy delivery in line with our therapeutic contract and the BACP Ethical Framework.

8.2 Personal Data may also be processed in accordance with any of the following conditions:

- With your explicit consent
- Where processing is necessary for carrying out obligations under contract between you and us.
- Where necessary for Cornerstone to carry out its legal obligations.
- Where necessary to protect your vital interests.

## 9. **DATA RETENTION**

Our data retention policy is dictated by the Data Protection Laws and is available for inspection by submitting a written request using the contact details provided in this policy.

## 10. **DATA DELETION**

Under Data Protection Laws you have the right to erasure under specific circumstances. A request for your personal data to be deleted will be decided on a case by case basis and must be submitted in writing to the contact details provided in this policy.

## 11. **DATA CORRECTION**

We will correct or update your data without delay provided you make the request in writing to the contact details provided in this policy, clearly specifying which data is incorrect or out of date.

## 12. **DATA INSPECTION**

12.1 We strive to be as open as we can be in terms of giving people access to their personal data. Individuals can find out if we hold any of their personal data by making a formal request under the Data Protection Laws. Such requests must be in writing to the contact details provided in this policy. If we do hold your personal data we will respond in writing within one calendar month of your request (where that request was submitted in accordance with this policy).

12.2 The information we supply will:

- 12.2.1 confirm that your data is being processed;
  - 12.2.2 verify the lawfulness and the purpose of the processing;
  - 12.2.3 confirm the categories of personal data being processed;
  - 12.2.4 confirm the type of recipient to whom the personal data have been or will be disclosed; and
  - 12.2.5 let you have a copy of the data in an intelligible form.
- 12.3 Please note that you may need to provide identification in order to prove who you are to access your data.
- 12.4 If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
- 12.5 In the instance that we do not hold information about you we will also confirm this in writing at the earliest opportunity.

### 13. **CHANGES**

We keep our privacy policy under regular review and you should check back regularly to ensure you are aware of changes to it. We may display this notice to you from time to time to help ensure you are aware of its contents.

### 14. **COMPLAINTS**

You have the right to complain about the processing of your personal data. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the [Information Commissioners Office](#).