Client Privacy Notice (Updated November 2023)

Data controller: Pregnancy Expectations Trauma and Loss Society (Petals)

The company collects and processes personal data relating to its clients in order to provide counselling services to them.

The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the company collect?

The company collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth, gender, ethnicity, disability, spoken language preference, GP details
- information about the reasons why you are seeking specialist counselling from Petals and
 information that you provide to Petals in the course of your counselling sessions (which may
 include special category data, as defined by the UK General Data Protection Regulation and
 the Data Protection Act 2018, for example data relating to your physical or mental health
 and your personal life)

The company collects this information throughout your interactions with the company. Your details are stored in our secure software system known as CORE Net. Petals also may collect personal data from you via the booking system Calendly, email, phone call or text.

Why does the company process personal data?

Processing personal data allows the company to provide its services to you and others.

The company has a legitimate interest in processing personal data during and after your interactions with the company.

In respect of special category data (as defined by the UK General Data Protection Regulation and the Data Protection Act 2018), you provide your explicit consent to the company processing such personal data for the purposes of the company providing its services to you.

Who has access to data?

Your information will be shared internally within the company for the purposes of providing services to you. This may include your personal data being shared with our administration and counselling teams.

We will not otherwise disclose your personal data to anyone outside the company to use for their own purpose without telling you, for example, by updating this privacy policy. The only exceptions to this are where disclosure is required by law or where life or the safety of yourself or others is at risk, in these circumstances your personal data may be shared with appropriate third parties. The company will not transfer your data to countries outside the UK.

How does the company protect data?

The company takes the security of your data seriously. The company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Where the company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the company keep data?

The company will hold your personal data for the duration of your interactions with the company. The periods for which your data is held after the end of your involvement with Petals as a client are in line with current ICO guidance.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the company to change incorrect or incomplete data;
- require the company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing; and
- ask the company to stop processing data for a period if data is inaccurate or there is a
 dispute about whether your interests override the company's legitimate grounds for
 processing data.

If you believe that the company has not complied with your data protection rights, you can complain to the <u>Information Commissioner</u>.