

# Privacy Notice

This website is owned by Dermot Casey ("I", "my", or "me").

If you have any concerns about this notice or your privacy please tell me. You can contact me through the Contact page on this website.

## Introduction

I am committed to protecting your privacy and the confidentiality of your personal information. I undertake to preserve the confidentiality of all information you provide to me and hope that you reciprocate.

In the context of the law and this notice, 'personal information' is information that clearly identifies you as an individual or which, if combined with other information, could be used to identify you. Acting in any way on personal information, including collecting, using, changing and storing is referred to as 'processing'.

This notice tells you what personal information I process, your privacy rights and how the law protects you.

## 1. Types of information processed

I process different kinds of personal information about you. These can be grouped as follows:

Your 'Identity' means your name and any other information that identifies who you are.

'Contact Information' includes information such as your address, email address, telephone numbers and any other information you have given to me for the purpose of communication.

'Clinical Information' is information that you provide to me before or during therapy about your circumstances and your beliefs.

'Transaction Information' includes information about payments or communications to and from you and other information about bookings you have made.

'Technical Information' includes your Internet protocol (IP) address, 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.

'Marketing Information' includes your preferences in receiving marketing from me; communication preferences; responses and actions in relation to your use of my services.

## **2. Special protection of sensitive information**

I take additional care in processing 'special category data' and Clinical Information.

Special category data is defined by the law as information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and trade union membership. It also includes health, genetic and biometric data.

In order to provide my services to you, I may need to process information that is special category data.

For example, during or after a therapy session, I may record Clinical Information that is important to recall for a later session. Because of the nature of my service, that information may be special category data.

Under law, I am able to process special category data where doing so is necessary for health or social care purposes or where you have given explicit consent for me to do so.

If I process special category data relating to you then I ensure that additional care is given in safeguarding it. For example, I consider whether I can minimise the amount of special category data I collect and whether I can anonymise it.

I take additional care in processing Clinical Information by using pseudonymisation, meaning that this information may no longer be attributed to a specific person without the use of additional information, which is stored securely and separately.

## **3. Membership of professional bodies**

I am a member of the British Psychological Society.

In addition to following the requirements of the law, my professional body requires me as a member to comply with a code of ethics, which includes principles relating to the confidentiality and privacy of client information.

My professional body requires me to report from time to time to a qualified and trusted supervisor in order to uphold my standard of care.

When I do so, the Identities of my clients are always protected through pseudonymisation, and my supervisor, like me, is governed by rigorous ethical standards as well as the law.

#### **4. If you do not provide required personal information**

Where I need to collect personal information by law, or in order to be able to provide my services under a contract I have with you, and you fail to provide that information when requested then I may not be able to perform that part of or all of that contract. If so, I will notify you of this at the time.

### **The bases on information about you is processed**

The law requires me to determine under which of six defined bases I process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which I process your personal information is no longer relevant then I shall immediately stop processing your data.

If the basis changes then if required by law I shall notify you of the change and of any new basis under which I have determined that I can continue to process your information.

#### **5. Information processed under a contract**

In order to provide my services, or in situations where you have requested that I provide my services, I must collect and record your personal information.

For example, when you book a session I presume you do so with intention to enter into a contract. In this situation, your personal information, which

includes your Identity, your Contact Information and Transaction Information is processed on the basis of Contractual Obligation.

I continue to process this information until the contract between us ends or until I am otherwise no longer required to keep your information.

## **6. Information I process with your consent**

Through actions when otherwise there is no contractual relationship between us, such as when you contact me through my website, you provide your consent to me to process personal information that includes your Identity, your Contact Information and Technical Information.

I continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by telling me. However, if you do so, you may not be able to use this website or my services further.

## **7. Information I process for the purposes of legitimate interests**

I may process information on the basis there is a legitimate interest, either to you or to me of doing so.

Where I process your information on this basis, I do so after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect me to process your data, and whether you would, in the round, consider it reasonable to do so

For example, I may process your information on this basis for the purposes of:

- record-keeping for the proper and necessary administration of my business
- protecting and asserting the legal rights of any party

- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where I believe I have a duty to do so

Where there is a legitimate interest such as where I perceive an imminent risk of death or serious harm to you or someone else, or to prevent a crime or a civil wrongdoing, I am permitted by law to disclose your personal information (for example, to your GP).

However, in every instance I would discuss the matter with you first before reaching a decision. Disclosures made without a patient's consent are very rare.

## **8. Information I process because I have a legal obligation**

Sometimes, I must process your information in order to comply with a statutory obligation.

For example, I may be legally required to disclose your Identity, your Contact Information and Clinical Information where I am concerned about terrorism or money laundering, or where I am required by a court of law.

This may include your personal information.

## **9. Information I process to protect vital interests**

In situations where processing personal information is necessary to protect someone's life, where consent is unable to be given and where other lawful bases are not appropriate, I may process personal information on the basis of vital interests.

For example, I may inform relevant organisations if I have a safeguarding concern about a vulnerable person you have mentioned.

## Uses of information

### 10. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

This website is hosted by Wix, which uses cookies for a number of different reasons including for security purposes; for monitoring the performance of this website; and for providing a good experience for visitors. You can read more about how Wix uses cookies at <https://support.wix.com/en/article/cookies-and-your-wix-site>

In order to track which pages you visit on this website and whether they are useful to you, this website uses Google Analytics. You can read more about how Google uses cookies at <https://policies.google.com/technologies/types>

## **11. Personal identifiers from your browsing activity**

Requests by your web browser to the servers for web pages and other content on this website are recorded.

This information is Technical Information, recorded for security purposes. Theoretically, if combined with other information known about you from previous visits, the data possibly could be used to identify you personally. However, I do not use it in such a way.

## **Other matters**

## **12. Your rights**

The law requires me to tell you about your rights and my obligations to you in regard to the processing and control of your personal information.

I do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

## **13. Delivery of my services using third party communication software**

With your consent, we may communicate using software provided by a third party such as Microsoft (Skype) or Zoom Video Communications (Zoom).

Such methods of communication should secure your personal information using encryption and other technologies. The providers of such software should comply with all applicable privacy laws, rules, and regulations, including the GDPR.

If you have any concerns about using a particular software for communication, please tell me.

## **14. Data may be processed outside the European Union**

My business is based in the Republic of Ireland.

The headquarters of my website hosting provider, Wix, are in Israel. Israel is considered by the European Commission to offer an adequate level of protection for the personal information of EU Member State residents.

Your personal information may be stored through Wix's data storage, databases and the general Wix applications. Data is stored on secure servers behind a firewall.

Your data may be maintained, processed and stored by Wix and their authorised affiliates and service providers in the United States of America, in Europe (including in Lithuania, Germany and Ukraine), in Israel, and in other jurisdictions as necessary for the proper delivery of their services and/or as may be required by law.

Wix affiliates and service providers that store or process your data on Wix's behalf are each contractually committed to keep it protected and secured, in accordance with industry standards and regardless of any lesser legal requirements which may apply in their legal jurisdiction.

Wix's full privacy policy can be viewed at: <https://www.wix.com/about/privacy>

## **15. Control over your own information**

It is important that the personal data I hold about you is accurate and current. Please keep me informed if your personal information changes.

At any time you may contact me to request that I provide you with the personal information I hold about you.

When I receive any request to access, edit or delete personal identifiable information I shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

## **16. Communicating**

When you contact me, whether by telephone, through this website or by email, I collect the information you have given to me in order to reply.

I may keep personal information associated with your message, including your Identity and Contact Information so as to be able to respond to you.

## **17. Sharing of information collected through my website**

I do not share or disclose to a third party, any information collected through my website.

## **18. Complaining**

If you are not happy with this privacy policy or if you have any complaint then you should tell me.

When I receive a complaint, I record all the information you have given to me.

I use that information to resolve your complaint.

If your complaint reasonably requires me to contact some other person, I may decide to give to that other person some of the information contained in your complaint. I do this as infrequently as possible, but it is a matter for my sole discretion as to whether I do give information, and if I do, what that information is.

If a dispute is not settled then I hope you will agree to attempt to resolve it by engaging in good faith with me in a process of mediation or arbitration.

If you are in any way dissatisfied about how I process your personal information, you have a right to lodge a complaint with the Data Protection Commissioner ('DPC'). This can be done at <https://forms.dataprotection.ie/contact>.

However, I would appreciate that if you have a concern, you raise it with me before complaining to the DPC.

## **19. Retention period for personal data**

I keep your personal information only for as long as required:

- to provide you with the services you have requested
- to comply with other law, including for the period demanded by tax authorities
- to support a claim or defence in court

## **20. Compliance with the law**

This privacy policy has been compiled so as to comply with the law of legal jurisdiction in which it might be relevant. If you think it fails to satisfy the law of your jurisdiction, please tell me.

However, ultimately it is your choice as to whether you wish to use this website and my services.

## **21. Review of this privacy policy**

I may update this privacy notice from time to time as necessary.

You are advised to print a copy for your records.