**Venus Coaching & Therapy Services Privacy Policy**

*Effective from October 21st, 2020*

Welcome to Venus Coaching & Therapy Services’ Privacy Policy. The General Data Protection Regulation (GDPR) went into effect on May 25, 2018, replacing the 1995 EU Data Protection Directive. The GDPR lays out specific requirements for businesses and organisations who are established in Europe or who serve users in Europe. It regulates how businesses can collect, use, and store personal data.

**1. Please read carefully**

Venus Coaching & Therapy Services cares deeply about the privacy of its website visitors and coaching/therapy clients. To that end, this Privacy Policy (“Privacy Policy”) describes how Venus Coaching & Therapy Services (“Venus Coaching & Therapy Services”, “we”, “our”, or “us”), collect, use, and share your Personal Information, as well as an explanation of the data rights you may have in that Personal Information. This Privacy Policy applies to all Venus Coaching & Therapy Services website users and coaching/therapy clients, including unregistered visitors and registered users (collectively, “Users”, “Clients”, “you”, or “your”), and to all our services, including our websites (including any landing pages or subdomains, the “Website”), web applications (“Apps”), mobile applications (“Mobile Apps”), and coaching/therapy services (collectively, the “Services”). This Privacy Policy is not intended to override the terms of any contract you have with us, nor any rights you may have under other applicable data privacy laws.

Prior to accessing or using our Services, please read this policy and make sure you fully understand our practices in relation to your Personal Information.  If you read and fully understand this Privacy Policy, and remain opposed to our practices, you must immediately leave and discontinue all use of any of our Services.  If you have any questions or concerns regarding this policy, please contact us at marie.darlow@venuscoaching.co.uk.

**2. Data Controllers**

​Venus Coaching & Therapy Services shall be considered as the “Controller” of your Personal Information, and are responsible for complying with all laws and regulations that may apply to the collection and control of such Information, including all privacy and data protection laws of all relevant jurisdictions. We are responsible for the security, integrity and authorised usage of Personal Information about Users/Clients, and for obtaining consents, permissions and providing any required data subject rights and fair processing notices required for the collection and usage of such Personal Information.

**3. What Personal Information We Collect**

To provide you with our Services, we must collect Personal Information relating to an identified or identifiable natural person (“Personal Information”). We collect Personal Information you provide us, from your use of our Services, and from other sources. Here are the types of Personal Information we collect about you:

**3.1** **Information You Provide Directly to Us**When you email us or text/telephone us, we will collect and store the Personal Information provided, to enable us to provide our Services and for record-keeping purposes.

**3.2 Information Collected via Third Parties When You Use Our Services**

We use a website hosting company, called Wix Ltd. (“Wix.com”), who collect information from you, and other sources, to ensure the efficient running of this website. When you purchase and/or register for our Services, when you subscribe to receive information from us, and/or when you contact us by any communication channel on our website (e.g. online contact form), they may collect Personal Information, such as name, email address, phone number, payment information (for Users purchasing Paid Services) and other information you include in your communications with us. Wix.com has no direct relationship with our Users, whose Personal Information it processes.

For detailed information on how your information (“Users-of-Users Personal Information”) may be handled by Wix, please see Sections 4, 6, 12 and 13 of Wix’s Privacy Policy at <https://www.wix.com/about/privacy>).

A Third Party App that is included as part of the appointment booking process on our website is “Zoom” (video-conferencing software), which collects information from you to be able to provide you with meeting links. Zoom has no direct relationship with our Users, whose Personal Information it processes. A Zoom account is not required if you are joining Zoom Meetings as a participant. If you decide to open an account with Zoom, they then become the Data Controller of any Personal Information you provide to them as part of that process. Zoom’s full Privacy Statement can be accessed at <https://zoom.us/privacy#_Toc44414842>.​

Once you have booked sessions to work with us, you may be asked to complete online questionnaires (via “Microsoft Forms”). We use Microsoft Forms for two purposes: 1) to collect Personal Information for contact/emergency/crisis purposes (e.g. contact information, emergency contact information, GP contact information); and 2) to collect specific details relating to the coaching/therapy issue(s). The information is gathered separately to ensure information of a sensitive nature is not provided with Personal Information. A Microsoft account is not required to complete these forms. Microsoft have no direct relationship with our Users, whose Personal Information it processes.

Microsoft’s Privacy Statement can be viewed at <https://privacy.microsoft.com/en-GB/privacystatement>.

1. **Why We Collect Personal Information**

We use your Personal Information for the following purposes:

* To enable you to book and pay for our Services;
* To enable you to book and pay for our Events;
* To enable you to download and/or pay for our Products;
* To provide you with meeting links via Zoom;
* To provide you with ongoing customer assistance;
* To be able to arrange emergency medical assistance and/or crisis intervention within coaching/therapy appointments;
* To facilitate your ongoing coaching or therapy services;
* To be able to contact you with general or personalised service-related notices and promotional messages;
* To help us to update, expand and analyse our records to identify new customers;
* To facilitate, sponsor, and offer certain contests, events, and promotions, determine participants’ eligibility, monitor performance, contact winners, and grant prizes and benefits;
* To create aggregated statistical data and other aggregated and/or inferred information, which we may use to provide and improve our services;
* To comply with any applicable laws and regulations; and
* To comply with the requirements of our insurance provider and membership organisations.

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**5. How We Share Your Personal Information**

We may share your Personal Information in the following manners and instances:

**5.1 Law Enforcement, Legal Requests and Duties:** Venus Coaching & Therapy Services may disclose or otherwise allow access to your Personal Information pursuant to a legal request, such as a subpoena, legal proceedings, search warrant or court order, or in compliance with applicable laws, if we have a good faith belief that the law requires us to do so, with or without notice to you.

**5.2 Protecting Rights and Safety:** Venus Coaching & Therapy Services may share your Personal Information if we believe in good faith that this will help protect the rights, property or personal safety of Venus Coaching & Therapy Services, any of our Users/Clients, yourself, or any member of the general public, with or without notice to you.

**5.3 Upon Your Further Direction:** Venus Coaching & Therapy Services may also share your Personal Information with third parties for other purposes upon your further direction or with your explicit approval.

**6. Where We Store Your Personal Information**

​ Venus Coaching & Therapy Services are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical and electronic procedures to safeguard and secure the information we collect.

**6.1** We strive to store Personal Information in hard copy where possible, within a locked filing cabinet. We operate a “split file” system, whereby any identifiable information (such as name and contact information) is kept separately from session notes.

**6.2 Microsoft Forms:** We aim to delete data held online in any Microsoft Form within 7 days of the form’s completion. We store a printed version of the data as a hard copy as detailed in 6.1.

**6.3 Emails:** We aim to delete all client emails received within 7 days of termination of coaching/therapy. We store a printed version of any emails required for record-keeping purposes as a hard copy as detailed in 6.1.

**6.4 Texts/Telephone Numbers:** We do not store client telephone numbers by name, but instead use a coding system. We aim to delete all client texts received and telephone numbers within 7 days of termination of coaching/therapy.

**6.5 Electronic Records:** When electronic records are created, we store them on an encrypted USB stick, kept in a locked filing cabinet when not in use.

**7. Use of Cookies**

Our website (created through Wix.com) uses cookies and other similar technologies (“Cookies”) in order for us to provide our online Service and ensure that it performs properly, to analyse our performance and marketing activities, and to personalise your experience. Please note that most browsers allow you to control cookies, including whether or not to accept them and how to remove them. You may set most browsers to notify you if you receive a cookie, or you may choose to block cookies with your browser.

**8. Messages from Venus Coaching & Therapy Services**

**8.1 Service Messages:** We need to use your Personal Information to be able to provide you with our Services. This may include responses to your own communications and also proactive messages from us, such as texted session reminders; emails with links/instructions/additional information/tools/techniques/payment reminders; and/or telephone calls when agreed for therapy/coaching or if technical issues arise with Zoom. Where possible, we will always contact you via your preferred method and will aim to only telephone when pre-agreed via email/text/online.

**8.2 Promotional Messages:** If you choose to “Subscribe” to our messages via our online form, we may use your Personal Information to send you promotional content and messages by e-mail, text, and/or notifications within our online platform. If you do not wish to receive such promotional messages or calls, you may notify Venus Coaching & Therapy Services at any time or follow the “unsubscribe” instructions contained in the promotional communications you receive.

**9. Your Rights in Relation to Your Personal Information**

Venus Coaching & Therapy Services agrees that it is imperative that you have control over your Personal Information. You have the right to request access to, receive a copy of, update, amend, delete, or limit the use of your Personal Information. ​

Before fulfilling your request, we may ask you for additional information in order to confirm your identity and for security purposes. We reserve the right to charge a fee where permitted by law (e.g. if your request is unfounded or excessive).

​​If you are a Venus Coaching & Therapy Services website User and/or Client, and you wish to receive a copy, access and/or request us to make corrections to the Personal Information that we hold for you, please email your request to marie.darlow@venuscoaching.co.uk or telephone 07534 795479. We will make reasonable efforts to honour your request promptly (unless we require further information from you in order to fulfil your request), subject to legal and other permissible considerations.

​Please note that we are obliged to hold client records (for those who have received therapy/coaching) for at least 7 years following the last occasion on which

therapy/coaching was provided. In the case of treatment to minors, records

are kept for at least 7 years after they reach the age of majority (18). As such, we are unable to delete client records within that time frame.

 **10. Online Security**

We value the security of your Personal Information and do everything in our power to protect it. However, as we can’t guarantee absolute protection, you are encouraged to be careful, set a strong password for your account online, and avoid submitting any sensitive information which, if exposed, could cause you major harm.

Once coaching/therapy has begun, we move to ProtonMail for all our email communications to you and recommend you do the same. ProtonMail’s end-to-end encryption means that nobody but you can read the messages in your mailbox (not even ProtonMail).

**11. Third-Party Websites**

Our website contains links to other websites and services. We are not responsible for such websites’ or services’ privacy practices. We encourage you to be aware when you leave our website and to read the privacy statements of each and every website and service you visit before providing your Personal Information. This Privacy Policy does not apply to such linked third-party websites and services.

**12. Questions & Complaints**

If you have any questions or concerns about our collection, use or disclosure of Personal Information, or if you believe that we have not complied with this Privacy Policy or applicable data protection laws, please contact us. ​Our Data Protection Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. We take every privacy complaint seriously and will make all reasonable efforts to resolve your complaint promptly and in accordance with applicable law.

​Whilst you can file a complaint with the Information Commissioner’s Office (via their website at <https://ico.org.uk/make-a-complaint/> or by telephone on 0303 123 1113) at any time, we recommend that you contact us first so we can try to resolve it.

**13. Updates**

We may update this Privacy Policy as required by applicable law, and to reflect changes to our Personal Information collection, usage and storage practices.

We encourage you to periodically access this document at our website ([www.venuscoaching.co.uk](http://www.venuscoaching.co.uk)) for the latest Information on our privacy practices. Unless stated otherwise, our most current Privacy Policy applies to all information that we have about you, with respect to our Website, Mobile Apps and other Services.

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**14. Contacting us**

If you have any questions about this Privacy Policy, or wish to exercise any of your rights as described in Section 9, please contact our Data Protection Officer, Marie Darlow, (at email - marie.darlow@venuscoaching.co.uk, or, telephone - 07534 795479), who will attempt to resolve any complaints regarding the use of your Personal Information in accordance with this Privacy Policy.

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