



## Privacy policy

The General Data Protection Regulation (GDPR) came into effect across Europe from Friday 25 May 2018. The Data Protection Act 1998 still remains law in the UK and GDPR is designed to strengthen it.

HALO Psychology is committed to protecting your personal information and being transparent about what information we hold. We will use your personal information in accordance with all applicable laws concerning the protection of personal information.

This privacy policy covers the information we collect about you when you use our products or services, or otherwise interact with us (for example, by attending out sessions or events), unless a different policy is displayed. The policy also describes the measures we take to safeguard such information.

In this policy, 'we' and 'us' refers to HALO Psychology Limited. We offer a wide range of services (coaching, workshops, consultancy, events etc.), which we refer to as 'Services' in this policy.

Where we provide the Services under contract with an organisation, that organisation controls the information processes by the Services.

We may change this policy from time to time so please check this page occasionally to ensure that you're happy with any changes.

### Section one: What information we collect about you

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below. We also collect information about you when you retain our Services or otherwise provide it directly to us.

**Content you provide through our Services:** The Services include the consultancy services you use, where we collect and store content that you send receive and share. For example, when we conduct consultancy, training, facilitation or coaching work with you, we may take notes during the sessions. This is a data processing activity and we will ask for your consent to take, store and review the notes and our contract sets out more detail on this.



**Content you provide through our website:** The Services also include our website, owned and operated by us. For example, you provide content to us when you provide feedback, sign up to our monthly newsletter, connect with us via social media, complete surveys for our research or register for workshops.

## Section two: Information we collect automatically when you use our Services

We collect information about you when you use our Services, including browsing our website and taking certain actions, for example, completing the subscribe button on the sign-up form for our newsletter. It also includes the features you use, the links you click on and frequently used search items.

**Cookies and other tracking items:** HALO Psychology and our third-party partners, such as our analytics partners, use cookies and other tracking technologies (e.g. web beacons, device identifiers and pixels) to provide functionality and to recognise you across different Services and devices. We use Google Analytics to understand how our media campaigns work and how you interact with our website in order to improve the user experience.

For some of the functions within our website we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies, and we encourage you to consult the privacy policies of these third party vendors on their websites for information regarding their use of cookies.

You can change your preferences for the HALO Psychology website and/or the websites of any third party suppliers by changing your browser settings. Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our website but some of the functions may not work correctly. You may also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies and for further information on cookies generally. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

## Section three: How we use information we collect

How we use information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.



**To provide the Services and personalise your experience:** We use information about you to provide the Services to you, including to process transactions with you, provide customer support and operate and maintain the Services.

**For research and development:** We are always looking for ways to make our Services smarter, faster, integrated and useful to you. We use collective learning about how people use our Services and feedback provided directly to us to troubleshoot and to identify trends, activity patterns and areas for improvement of the Services.

**To communicate with you about the Services:** We use your contact information to send you transactional communications via email and within the Services, responding to your comments, questions and requests, providing customer support, and sending you notices updates and administrative messages. These communications are part of the Service and in most cases you can opt out of them (available in the communication itself).

**To drive engagement with the Services:** We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email. These communications are aimed at driving engagement and maximizing what you get out of the Services, including information about new features, newsletters and events we think may be of interest to you. You can opt-out of these communications.

**To protect our legitimate business interests and legal rights:** Where required by law or where we believe it is necessary to protect our legal rights interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory and audit functions.

**With your consent:** We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured case studies to promote the Services with your permission.

#### **Section four: How we store and secure information we collect**

We use Wordpress as our webhosting service provider. Wordpress is based in the United States.

We use G Suite for Business as our email provider. G Suite is owned by Google and based in the United States. Data is stored in Google data centres.

We use MailChimp as our newsletter service provider. MailChimp is based in the United States but participates in and has certified compliance with the EU-US Privacy Shield



Framework. They comply with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland.

We use Norton Security to back up our data. Norton is owned by Symantec Corporation, based in the United States. While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care is absolutely safe from intrusion by others.

### **Section five: How long we keep information**

We keep account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. Files on individuals (for consultancy, development or coaching purposes) will be held for a period of up to three years. After such time, we will either delete or anonymise the information.

### **Section six: Third parties**

For the avoidance of doubt, we do not and never shall sell your personal data to third parties for marketing or advertising purposes.

We work closely with a number of third parties (including psychometric test providers and other service providers) and we may receive information from them about you. These third parties may collect information about you including, but not limited to, your IP address, device-specific information and location information. In some instances, they may be acting as data controller and they will have their own privacy policies, which we advise you to read.

We may pass your personal data to third parties for the provision of services on our behalf (for example, sending our newsletter or processing your payment). However, we will only ever share information about you that is necessary to provide the service and we have specific contracts in place, which ensure your personal data is secure and will not be used for any marketing purposes.

We may share your information if we are acquired by a third party and therefore your data will be deemed an asset of the business. In these circumstances, we may disclose your personal data to the prospective buyer of our business, subject to both parties entering into appropriate confidentiality undertakings. Similarly, we may share your personal data if we are under a duty to disclose data in order to comply with any legal obligation or to protect the rights, property, or safety of HALO Psychology, our customers, or others. This includes but is not limited to exchanging information with other companies and organisations for the



purposes of fraud protection, credit risk reduction and dispute policies. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

## Contact us

Your information is controlled by HALO Psychology. If you have questions or concerns about how your information is handled, please direct your inquiry to Hayley Lewis by emailing [hayley@halopsychology.com](mailto:hayley@halopsychology.com)