



Last updated November 30th, 2021

Thank you for choosing to be part of our community at Harmonia Therapy Ltd, doing business as Evolve Counselling & Therapy Centre ("Evolve Counselling & Therapy Centre," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, please contact evolve@evolveleeds.com.

This privacy notice describes how we might use your information if you:

- Visit our website at <http://www.evolvecounselling.co.uk>
- Engage with us in other related ways — including any sales, marketing, or event.

In this privacy notice if we refer to:

- "**website**," we are referring to any website of ours that references or links to this policy
- "**services**," we are referring to our website, and other related services, including any sales, marketing, or events

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our services immediately.

Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.

What information do we collect?

- Personal information you disclose to us - we collect personal information that you voluntarily provide to us when you express an interest in obtaining

information about us or our products and services, when you participate in activities on the website or otherwise when you contact us. The personal information that we collect depends on the context of your interactions with us and the website, the choices you make and the products and features you use.

The personal information we collect may include the following:

- Personal information provided by you -we collect names; phone numbers; email addresses; contact preferences; billing addresses; debit/credit card numbers; age; contact or authentication data; and other similar information.
- Payment data - we may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Adyen BV and Stripe. You may find their privacy notice link(s) here: <https://www.adyen.com/policies-and-disclaimer/privacy-policy> and <https://stripe.com/gb/privacy>.
- Information automatically collected - we automatically collect certain information when you visit, use, or navigate the website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our website and other technical information. This information is primarily needed to maintain the security and operation of our website, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- Log and usage data –log and usage data is service-related, diagnostic, usage, and performance information which our servers automatically collect when you access or use our website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity in the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).

How do we use your information?

We use personal information collected via our website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- Request feedback. We may use your information to request feedback and to contact you about your use of our website.
- To send administrative information to you. We may use your personal information to send you service information and/or information about changes to our terms, conditions, and policies.
- To protect our Services. We may use your information as part of our efforts to keep our website safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- To respond to legal requests and prevent harm. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- Fulfill and manage your payments. We may use your information to manage your payments made through the website.
- To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our services.

Will your information be shared with anyone?

We may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract: Where we have entered a contract with you, we may process your personal information to fulfil the terms of our contract.
- Legal Obligations: We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a

judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- More specifically, we may need to process your data or share your personal information in the following situations:
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Google Maps Platform APIs.** We may share your information with certain Google Maps Platform APIs (e.g., Google Maps API, Place API). To find out more about Google's Privacy Policy, please refer to [this link](#).
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the website, which will enable them to collect data on our behalf about how you interact with our website over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages, or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

Who will your information be shared with?

We only share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "

- Data Analytics Services
- Finance & Accounting Tools
- Payment Processors
- Communication & Collaboration Tools
- Cloud Computing Services
- Ad Networks

- Data Storage Service Providers
- Evolve Affiliate Therapists

Do we use cookies and other tracking technologies?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

How long do we keep your information?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than 90 days.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

How do we keep your information safe?

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our website is at your own risk. You should only access the Website within a secure environment.

What are your privacy rights?

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to

your local data protection supervisory authority. You can find their contact details here: https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our website. To opt-out of interest-based advertising by advertisers on our website visit <http://www.aboutads.info/choices/>.

Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

Do california residents have specific privacy rights?

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

Do we make updates to this notice?

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be

effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

How can you contact us about this notice?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Nicola Hepinstall, by email at evolve@evolveleeds.com, by phone at 0113 4679673, or by post to:

Harmonia Therapy Ltd
Nicola Hepinstall
25a Park Square West
Leeds, West Yorkshire LS1 2PW
United Kingdom

How can you review, update, or delete the data we collect from you?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking [here](#).