Halcyon Clinical Psychology and Animal Assisted Therapy CIC Privacy Notice

Introduction

Welcome to Halcyon Clinical Psychology and Animal Assisted Therapy CIC's Privacy Notice. We understand that your privacy is important. This notice explains what personal information we collect, why we collect it, how we use it, who we may share it with, how we keep it safe and your rights. We are committed to handling your information lawfully, fairly and confidentially.

Halcyon CIC provides psychological therapy and counselling services in a confidential setting. This Privacy Notice explains how we collect, use and protect your personal information when you contact us, use our website or receive our services.

1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Halcyon Clinical Psychology and Animal Assisted Therapy CIC collects and processes your personal data when you use our services or when you use our website, including any data you may provide through this website when you contact us or purchase our services.

The website is not intended for children and we do not knowingly collect data relating to children via our website other than the information that parents choose to share about their children upon first contacting us or the subsequent information we collect after we have entered into an agreement with you about our provision of services (see 'Sensitive Data' below).

It is important that you read this Privacy Notice together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal or sensitive data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and privacy policies and is not intended to override them.

Controller

Halcyon Clinical Psychology and Animal Assisted Therapy CIC is the data controller and we are responsible for your personal data (referred to as "we", "us" or "our" in this privacy notice).

As a small organisation, Halcyon Clinical Psychology and Animal Assisted Therapy CIC is responsible for managing your personal information. If you have any questions about this Privacy Notice or wish to exercise your data protection rights, please contact us using the details below.

Contact details

If you have any questions about this Privacy Notice or our privacy practices, please contact:

Dr. Catherine Binney, Halcyon Clinical Psychology and Animal Assisted Therapy

Email address: admin@halcyoncic.com

Postal address: Studio 2, Brookend Farm Business Estate, Brookend Lane, Kempsey, Worcs WR5 3LF

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep this Privacy Notice under regular review. Version 2.0 – July 2026.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth, profession and gender.
- **Next of Kin Data** including first name, last name and their contact data.
- **Insurance Policy Data** if relevant including policy and authorisation numbers.
- **GP Data** Details of GP or other medical professionals involved with you/your child's care.
- **School Data** – name of your child's school where relevant.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, 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 our website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data

will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Sensitive Data includes information about your/your child's health, including information about your/your child's existing and previous medical, developmental and mental health conditions, medication details, psychiatric history and any other relevant health information to enable us to carry out our services to you. During the course of our provision of services to you or your child, we may also collect sensitive data such as details about your/your child's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, criminal convictions or offences.

We require your explicit consent for processing sensitive data, so when you submit your details and we offer our services to you, we will send you a further communication asking for you to confirm your consent to this processing.

Clinical Records
We keep accurate clinical records to support your care and to meet our legal, professional and regulatory responsibilities. Only those who need access to your information to provide your care or meet our legal obligations will have access to your records.

Approved Clinical Documentation Technology
To support accurate clinical record keeping, Halcyon CIC may use approved clinical documentation technology, including NovoNote and, where appropriate, Heidi Health. These systems may securely process information discussed during therapy sessions to assist with preparing clinical notes. Your clinician remains responsible for reviewing, editing and approving all records and for every clinical decision. You will always be informed if this technology is being used during your care and consent explicitly sought.

Practice Management System
We use WriteUpp as our secure practice management system to manage appointments, clinical records, invoices and routine communications relating to your care.

Online Appointments

Where appropriate and agreed with you, we may offer appointments by secure video conferencing using platforms such as **Zoom, Microsoft Teams or Google Meet**.

These services process personal information, including your name, email address, IP address and technical information required to establish and maintain the video call. Depending on the platform and your settings, limited meeting metadata (such as the date, time and duration of the appointment) may also be processed.

We take reasonable steps to use reputable providers with appropriate security measures and configure our accounts to protect your privacy wherever possible. We do not routinely record online therapy sessions. If recording were ever proposed for a specific purpose, this would only take place with your explicit prior agreement.

These providers process personal data in accordance with their own privacy notices, which explain how they collect, use and protect your information:

- Zoom Privacy Statement
- Microsoft Privacy Statement
- Google Privacy Policy

We encourage you to review the relevant privacy notice before participating in an online appointment.

International Transfers

Some of the service providers we use to support our services, including approved clinical documentation technology, may process personal information outside the United Kingdom. Where this occurs, Halcyon CIC takes reasonable steps to ensure that providers have appropriate safeguards in place in accordance with UK data protection law before using their services.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services or goods). In this case, we may have to cancel a service or product you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions**. You may give us your Identity, Next of Kin, Contact, Financial, Insurance Policy, GP and School Data and Sensitive Data (see above) by filling in forms before or during an appointment, making an enquiry about our services, verbally during discussions at our practice, or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services or any of our products;
  - subscribe to our service or publications;
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

(a) Technical Data may be received from website analytics providers and website hosting providers where these services are used (e.g. Google, Eventbrite).

(b) If we use social media or online advertising services, those providers may receive limited technical information in accordance with their own privacy notices (e.g. Meta).

(c) Search information providers such as Google based outside the United Kingdom and, where relevant, the EEA.

- Payment and appointment information may be processed by our payment providers and practice management systems where necessary to provide our services.

- We may occasionally verify publicly available information where this is necessary for legitimate business purposes.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

We will always have a lawful basis for processing your personal information. Where we process special category information, such as health information, we will do so in accordance with UK data protection law and our professional obligations. Where consent is required, we will ask for it separately and you may withdraw it where appropriate.

We hold email/website form enquiry information for a period of up to 1 year including in instances when you do not enter into a contract immediately with us after initial enquiry, in case we later enter into a contract with you within this time period and your supplied information and contact data is helpful for us to provide a service to you.

You may withdraw your consent at any time by writing to us by e-mail at admin@halcyoncic.com. If you do so, we shall not be able to provide our services further.

You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer/client	(a) Identity (b) Next of Kin (c) Contact (d) Insurance Policy (e) GP	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to collect fees due to us)

To provide our services and to process and deliver any orders including: (a) provide our services to you (b) Manage payments, fees and charges (c) Collect and recover money owed to us	(a) Identity (b) Next of Kin (c) Contact (d) Next of Kin (e) Insurance Policy (f) GP (g) Financial (h) Transaction (i) Marketing and Communications (j) Sensitive Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Explicit consent (in the case of Sensitive Data).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Notifying you about appointments or travel alerts related to appointments (c) Asking you to leave feedback, a review or take a survey	(a) Identity (b) Contact (c) Next of Kin (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in providing feedback or complete a survey	(a) Identity (b) Contact (c) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Usage (d) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

Our lawful ground of processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However you can still opt out of receiving marketing emails from us at any time.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Cookies Notice – cookies we use on our Website

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Our website uses cookies and similar technologies to ensure the website functions correctly, to remember your cookie preferences, and, where you have given consent, to help us understand how visitors use our website and to provide embedded features such as Google Maps.

The exact cookies used may change from time to time as Wix and our third-party providers update their services.

- **Essential cookies**. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical or performance cookies**. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

The table below describes the types of cookies we currently use and their purpose.

Cookie / Provider	Category	Purpose	Typical Duration
XSRF-TOKEN (Wix)	Essential	Helps protect the website against malicious or fraudulent requests by providing security protection.	Session
hs (Wix)	Essential	Security cookie used to help protect the website and maintain secure sessions.	Session
svSession (Wix)	Essential	Identifies a unique visitor session and enables core website functionality.	Up to 12 months
SSR-caching (Wix)	Essential	Improves website performance by managing page caching.	Up to 24 hours
TS* (Wix)	Essential	Security cookies used to protect the	Session

		website and detect malicious activity.	
bSession (Wix)	Essential	Supports website performance monitoring and system stability.	Up to 24 hours
fedops.logger.sessionId (Wix)	Essential	Collects technical information to monitor website performance and reliability.	Session
Usercentrics Consent Cookie(s)	Essential	Records your cookie consent choices so they can be remembered during future visits.	Up to 12 months
Visitor Analytics (Twipla)	Analytics	Collects anonymous or pseudonymised information about how visitors use our website to help improve the website. These cookies are only set if you consent.	Varies (typically up to 12 months)
Google Maps	Functional	Enables embedded interactive maps. Google may place cookies when the map is loaded or interacted with. These cookies are only used if you consent where required.	Varies

For more information on cookies or to learn how to delete or control cookies across different browsers as well as general information on Cookies, please visit *www.aboutcookies.org* or *https://allaboutcookies.org/*

Managing Your Cookie Preferences
When you first visit our website, you will be asked whether you wish to accept optional cookies.

You can:
• accept all optional cookies;
• reject all optional cookies; or
• choose which categories of cookies you wish to allow.

You can change your preferences at any time by clicking the Cookie Settings link available on our website.

You can also manage or delete cookies through your browser settings. Disabling essential cookies may affect website functionality.

Third-Party Cookies
Some features of our website rely on services provided by third parties, including Visitor Analytics and Google Maps. These providers may collect information through cookies in accordance with their own privacy policies.

Review of this Cookie Notice
We review the cookies used on our website periodically. This Cookie Notice will be updated where necessary to reflect changes to the technologies or services we use.

To deactivate the use of third party advertising cookies, you may visit the consumer page to manage the use of these types of cookies. Most browsers allow you to turn off cookies. To do this look at the 'help' menu on your browser. Switching off cookies may restrict your use of the website and/or delay or effect the way in which it operates.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table 'Purposes for which we will use your personal data' above.

- Service providers, acting as processors who provide IT and system administration services.
- Professional advisers, acting as processors or joint controllers, including healthcare professionals, lawyers, accountants, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities, acting as processors or joint controllers, based who require reporting of processing activities in certain circumstances.
- Students in higher education, on placement with our organisation who will be subject to the same confidentiality obligations and security checks as any of our staff and who will hold contracts with us. Any student will only access information appropriate to their role and under appropriate supervision.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Some of the organisations we use to support our services may process information outside the United Kingdom and, where relevant, the European Economic Area (EEA). Where this occurs, Halcyon CIC takes reasonable steps to ensure that providers have appropriate safeguards in place in accordance with UK data protection law before using their services. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the United Kingdom and the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep medical information about patients for 7 years after treatment has finished. For any children we treat we are obliged to retain the medical information until 7 years after the child's 18th birthday (8 years if the child was 17 when treatment ended). (see *www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care).* By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. Our retention periods are reviewed periodically to ensure they remain consistent with current professional guidance.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints about how we use your information

If you have any concerns about how we have used your personal information, we encourage you to contact us first so that we can try to resolve the matter. If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO).

Policy Review

This policy will be reviewed every two years, or sooner if there are changes to legislation, guidance or organisational arrangements.

Policy Owner: Director

Version: 2.0

Effective Date: July 2026

Review Date: July 2028