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# PRIVACY POLICY

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ACTO understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, [https://acto.org.uk/](https://acto.org.uk). We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

## 1. Information About Us

Our website is owned and operated by **ACTO, Association for Counselling and Therapy Online Ltd**, registered in England under company number 10620417.

Registered address: 42, Buchanan Road, Walsall WS4 2EN United Kingdom.

**Data Controller number:** ZA816061

## 2. What Does This Policy Cover?

This Privacy Policy applies only to your use of our website. Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## 3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
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- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.

## Association for Counselling and Therapy Online

ACTO is the trading name Association for Counselling and Therapy Online Ltd; Registered address: 42, Buchanan Road, Walsall WS4 2EN United Kingdom. Registered in England; Company No. 10620417; Although our members may not all be resident within England and Wales any ACTO contract, and the work to which it relates, are subject to the jurisdiction of the laws of England & Wales.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office <https://ico.org.uk/>.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves

### 5. What Data Do You Collect and How?

Depending upon your use of our website, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any personal data relating to children **AND/OR** data relating to criminal convictions and/or offences.

Data type	Data Collected	How We Collect the Data
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1	Name, title, email address, telephone number.	Via our website contact form, application form and personal email.
2	Date of birth, address	Via our website contact form, application form and personal email.
3	Proof of training, academic qualifications, liability insurance certificate.	Via our website contact form, application form and personal email.
4	Business name, job title, profession.	Via our website contact form, application form and personal email.
5	Card details for membership payment, bank account details if direct debit to be activated. Proof of ID.	Via our website contact form, application form and personal email.

## 6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your personal data, and our lawful bases for doing so:

The legal basis we use for collecting and maintaining this data is a combination of contract and legitimate interest.

What We Do	What Data We Use (there are occasions when we do not use all elements of each data type above)
Assessment of membership application	1, 2, 3, 4
Membership registration	1, 2, 3, 4
Registering you on our Website	1,4.
Directory for therapists and supervisors to advertise their services	1,4.
Managing payments for membership.	1, 5.
Communicating with you.	1.
Supplying you with information by email that you have opted-in-to (you may opt-out at any time)	1

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email AND/OR or telephone with information, news, and offers on our and our partners services.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to optout.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

## 7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

## 8. How and Where Do You Store or Transfer My Personal Data?

ACTO operates in the UK, however, we will only store your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

### **Information Commissioner's Office.**

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality.
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

## 9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exception.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the EEA and under the Data Protection Legislation, as explained above in Part 8.

## 10. Can I Withhold Information?

You may access certain areas of our website without providing any personal data at all.

However, to use all features and functions available on our you may be required to submit or allow for the collection of certain data.

#### 11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to this email address [office@acto-org.uk](mailto:office@acto-org.uk). To make this as easy as possible for you, a Subject Access Request Form will be provided for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one week and not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of two months from the date we receive your request. You will be kept fully informed of our progress.

#### 12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of: Hayley Hervé Email

address: [office@acto-org.uk](mailto:office@acto-org.uk)

Telephone number:

#### 13. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 20<sup>th</sup> September 2021.