



Website Privacy Policy

This is the privacy policy of Light House Psychology (<https://louhillier.co.uk>). In this document "we", "our", or "us" refers to Lou Hillier, Chartered Psychologist and any employees/associates of Light House Psychology.

This privacy notice aims to inform you about how we process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information. We undertake to preserve the confidentiality of all information you provide to us.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR). The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>. We do not share, or sell, or disclose to a third party, any information collected through our website.

1. Data Protection Officer

We have appointed a data protection officer (DPO) who is responsible for ensuring that our policy is followed. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO via email to: info@louhillier.co.uk

2. Data we process

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time. We currently may only store your email address, your telephone number and your name and we can only acquire these with your express consent.

Your contact information includes information such as billing address, delivery address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting. When you pay for Services this is done either via PayPal or via online Bank Transfer, and your personal details concerning these transactions is not stored by us.

Your financial data includes information such as your bank account and payment card details. We may need to acquire this information from you in order to make refunds but we will not store it after the refund has been made.

Transaction data includes details about payments or communications to and from you and information about products and services you have purchased from us.

Technical data includes your internet protocol (IP) address, 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 this our website. We do not store any of this information.

Your profile includes information such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. We do not currently request or store any of this information.

Marketing data includes your preferences in receiving marketing from us; communication preferences; responses and actions in relation to your use of our services. We only store your name and email address if you voluntarily subscribe to receive a monthly email news update. You are able to unsubscribe at any time. We do share your name and email address with any third parties.



We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity. For example, we may aggregate profile data to assess interest in a product or service.

If we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be protected and only used in accordance with this privacy notice.

3. Special personal information

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. It may also include information about criminal convictions and offences. We do not collect any special personal information about you.

4. If you do not provide personal information we need

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 that contract. In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

The bases on which we process information about you - The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category. If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data. If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

5. Information we process because we have a contractual obligation with you

When you create an account on our website, buy a product or service from us, or otherwise agree to our terms and conditions, a contract is formed between you and us. In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information. We may use it in order to:

- verify your identity for security purposes
- sell products to you
- provide you with our services
- provide you with suggestions and advice on products, services and how to obtain the most from using our website

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract. We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

6. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information, such as your name, email address and telephone number.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies. If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful. We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists. You may withdraw your consent at any time by instructing us via email address or webpage. However, if you do so, you may not be able to use our website or our services further.



7. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so. Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would consider it reasonable to do so
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For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business.
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

8. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation. For example, we may be required by law to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order. This may include your personal information.

9. Information provided on the understanding that it will be shared with a third party

Our website does not currently allow you to post message or information so that information can be read, copied, downloaded, or used by other people. Should this feature be included in our website in future, examples include:

- posting a message on a forum
- tagging an image
- clicking on an icon next to another visitor's message to convey your agreement, disagreement or thanks

In posting personal information, it is up to you to satisfy yourself about the privacy level of every person who might use it. We will not specifically use this information except to allow it to be displayed or shared. The information you share is stored on the website until you delete it. We would reserve the right to use it in the future in any way we decide.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time. If there is no function that allows you to delete your own comments, then provided your request is reasonable and there is no legal basis for us to retain any information you shared, then we may agree to your request to delete personal information that you have posted but this will be at our discretion. You can make a request by contacting the DPO at info@louhillier.co.uk

10. Complaints regarding content on our website

Our website is a publishing medium. Anyone may register and then publish information about himself, herself or some other person. We do not currently have any user generated content, should we do so in the future, this will be moderated but we are not always able to do so immediately that content is published. We do not currently allow users to post comments.

If you wish to complain about any of the content on our website, please email the DOP at infor@louhillier.co.uk and we shall investigate your complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.



Free speech is a fundamental right, so we have to make a judgment as to whose right will be obstructed: yours, or that of the person who posted the content you are complaining about. If we think your complaint is without basis, we shall inform you of this and the reason but not engage in further correspondence. If your complaint is judged to have merit, then we will inform you of this and the content will be moderated or removed.

11. Information relating to your method of payment

We do not store information about your debit or credit card or other means of payment without your consent. Payments via this website will only store your payment information at your request in order to make repeat purchasing of goods and services easier next time you visit our website.

We will take the following measures to protect your payment information:

- We keep your payment information encrypted on our servers.
- We do not keep all your payment information so as:
 - a) to prevent the possibility of our duplicating a transaction without a new instruction from you;
 - b) to prevent any other third party from carrying out a transaction without your consent
- Access to your payment information is restricted to authorised staff only.
- If we ask you questions about your payment information, we only show [partial detail OR the first four OR the last four digits of the debit or credit card number], so that you can identify the means of payment to which we refer.

We will automatically delete your payment information after 3 months OR when a credit or debit card expires.

12. Communicating with us

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. We record your request and our reply in order to increase the efficiency of our business. We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

13. Complaining

When we receive a complaint, we record all the information you have given to us. We use that information to resolve your complaint. If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is. Information will only be shared on a 'need to know' basis, which is deemed justifiable, all identifiable information is withheld when compiling statistics about complaints for quality control purposes.

14. Affiliate and business partner information

We do not currently process information from affiliates and business partners through this website. Should we do so in future, this is information given to us by you in your capacity as an affiliate of us or as a business partner. It would allow us to recognise visitors that you have referred to us, and to credit you with commission due for such referrals. It would also include information that allows us to transfer commission to you. The information is not used for any other purpose. We would preserve the confidentiality of the information and of the terms of our relationship. We would expect any affiliate or partner to agree to reciprocate this privacy policy.

15. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved. Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.



Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. Our website uses cookies. They are placed by software that operates on our hosts servers, and by software operated by third parties whose services we use.

We do not currently automatically ask you whether you accept the cookies used on our website. When this function is added, if you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose. If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in to our website (not currently used)
- to record your answers to surveys and questionnaires on our site while you complete them (not currently used)
- to record the conversation thread during a live chat with our support team (not currently used)

16. Personal identifiers from your browsing activity

Requests by your web browser to our host's servers for web pages and other content on our website are recorded, such as your geographical location, your Internet service provider and your IP address. We only use this information anonymously in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you and other users.

Technically, if combined with other information we know about you from previous visits, the data could be used to identify you personally, but the only circumstance that this would occur is in the unlikely event that records are subpoenaed by criminal or civil court proceedings.

17. Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website. We may use a third party to provide us with re-marketing services from time to time but we do not currently do this. If we do in the future, then if you have consented to our use of cookies, you may see advertisements for our type of products and services on other websites.

18. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice and our separate confidentiality agreement), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use. No such information is personally identifiable to you.

19. Third party advertising on our website

We do not currently allow third parties to advertise on our website. Should we do so in future, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website. They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts. We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

20. Credit reference

To assist in combating fraud, we share information with credit reference agencies, so far as it relates to clients or customers who instruct their credit card issuer to cancel payment to us without having first provided an acceptable reason to us and given us the opportunity to refund their money.



21. Data may be processed outside the European Union

Our website is hosted in the United Kingdom. We do not currently use outsourced services in countries outside the European Union. Should we do so in future, it will be from time to time in other aspects of our business. Then, accordingly data obtained within the UK or any other country could be processed outside the European Union. For example, some of the software our website uses may have been developed in the United States of America or in Australia. We use the following safeguards with respect to data transferred outside the European Union:

- the processor is within the same corporate group as our business or organisation and abides by the same binding corporate rules regarding data processing.
- the data protection clauses in our contracts with data processors include transfer clauses written by or approved by a supervisory authority in the European Union or countries outside the EU.
- we comply with a code of conduct approved by a supervisory authority in the European Union or countries outside the EU.
- we are certified under an approved certification mechanism as provided for in the Act.
- both our organisation and the processor are public authorities between whom there is either a legally binding agreement or administrative arrangements approved by a supervisory authority in the European Union relating to protection of your information.

22. Your duty to inform us of changes

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

23. Access to your personal information

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website, we do not currently have a sign-in to personal account facility. To obtain a copy of any information that is not provided on our website you should contact us to make that request. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

24. Removal of your information

If you wish us to remove personally identifiable information from our website, you should contact us to make your request. This may limit the service we can provide to you.

25. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

26. Use of site by children

We do not sell products or provide services for purchase by children, nor do we market to children. If you are under 18, you may use our website with consent from a parent or guardian. Our website is designed to be safe for use by adults and children over 14 years of age. We collect data about all users of and visitors to these areas regardless of age, and we anticipate that some of those users and visitors will be children.

27. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us. Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.



28. How you can complain

If a dispute about your personal information leads to you making a complaint to us, please send an email to the DPO info@louhillier.co.uk If the dispute is not settled between us, then we will attempt to resolve it by engaging a third party for a process of mediation or arbitration. If you are still not satisfied with how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

29. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

30. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you. However, ultimately it is your choice as to whether you wish to use our website.

31. Review of this privacy policy

We will update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us at info@louhillier.co.uk.