



## Privacy Notice

Aruna Therapy referred to as 'Aruna Therapy', 'we' or 'our' is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection (Jersey) Law 2018 (DPJL).

Aruna Therapy is the "Data Controller". This means that we are responsible for deciding how we hold and use personal information.

We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

Aruna Therapy is registered with the Jersey Office of the Information Commissioner, Registration No. 61545.

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

We will also only transfer your information when it is safe to do so, when it is necessary to do so and your information is protected in the same way that we protect it.

Aruna Therapy is accountable to you and the Authorities to not only show compliance with the data protection laws but also to demonstrate how we are compliant.

## The Data Protection Lead ("DPL")

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We have appointed a DPL to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or, how we handle your personal information, please contact the DPL at [Karina.frey@arunatherapy.com](mailto:Karina.frey@arunatherapy.com)

You have the right to make a complaint at any time to the Jersey Office of the Information Commissioner, the supervisory authority in Jersey for data protection issues.

Contact details for these is outlined at the bottom of this Privacy Notice.

## The Kind of Information We Hold About You

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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).

To explain this to you, we will when necessary list our different services when we collect or use different information about you.

## How Is Your Personal Information Collected?

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We collect personal information about you when you contact us to inquire about our services, use our support services, email you marketing information when you have agreed for us to do so, forms and surveys you complete, or provide use with your information for another specific purpose.

## What information do we collect about you?

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### *Contact use about our services*

- Records of email correspondence
- Name and contact details

### *Book a Session*

- Name
- Telephone number
- Email Address
- Billing address

### *Counselling, Mental health and wellbeing or Journey therapy sessions*

- Name
- Email address
- Telephone number
- Session notes (may contain special category data)

## Online Store

- Details of your purchase
- Name, date and billing address

## Marketing communication

- Name
- Email address

## What Special Category Data we collect about you?

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We collect what is called Special Category data we will always have either a clear legal basis to process this or your explicit consent. If we rely on your explicit consent, you can withdraw this at any time by contacting our DPL at [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com)

Special Category data is any information relating to your health, gender, race, sexual orientation, sex life, genetic or biometric data etc.

An example of this processing would be information you provide to us during a Counselling/therapy session. Notes taken from your sessions will be maintained in your file while you are using our services. This information is then stored very safely in our computer system and/or in a locked filing cabinet. We will ask for your consent to collect this information and to store it.

## How We Will Use Information About You?

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We will only use your personal information when the law allows us to, this is called a legal basis (highlighted in bold) for processing your information (data).

Most commonly, we will use your personal information in the following circumstances:

1. Where we need to comply with a **legal obligation**.
2. Where you have entered into a **contract** with us to provide you with a service. This would be when you take part in our 3-month session program.
3. 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.
4. Where you have given your **consent** for processing. This may be when you consent for us to take notes during your session or for us to collect sensitive data about you.

We may also use your personal information in the following situations, which are likely to be rare:

1. In an emergency and it is in your **vital interest** that we share your information, when we have it recorded.

## Change of purpose

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

## Data Sharing

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We may on occasions pass your Personal Information to organisation outside of Aruna Therapy exclusively to process on our behalf, these organisations are called Third Parties.

Aruna Therapy requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice.

We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, Aruna Therapy may disclose your Personal Information to meet legal obligations, regulations, or valid governmental request such as a Police request. In certain circumstances, we may need to share your data with your GP or Insurance company. If this is needed, we will ensure we have your consent before making this transfer.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

Data collected from clients as part of their initial consultation or notes about sessions are held in Jersey and the United Kingdom using different secure servers. Aruna Therapy use Wix.com as their website builder. Wix.com do not store your personal information on behalf of Aruna Therapy. For more information about how Wix.com use information, please visit <https://www.wix.com/about/privacy>

For our website counselling/therapy bookings we use Calendly.com. Calendly do not store your personal information on behalf of Aruna Therapy. For more information about how Calendly.com use information, please visit <https://calendly.com/pages/privacy>

We use Mailchimp as our direct marketing platform to send you marketing communications when you provide consent for us to do so. When we create an email campaign, we will provide Mailchimp with your name and email. Mailchimp only use your data in accordance with our contract with them. For more information about how Mailchimp.com use information, please visit <https://mailchimp.com>

We use social media to promote our brand, activities, services and to allow the public to get in touch with us.

We use Meta's products Facebook and Instagram for marketing purposes. We do not control how Meta processes personal data when you contact us or interact with us by using this platform. Meta is the controller of the data; therefore, Meta applies separate policies and terms. For more information, please visit Facebook's Privacy Notice at [www.facebook.com/policy.php](http://www.facebook.com/policy.php) and Instagram's Privacy Notice at [www.help.instagram.com/519522125107875](http://www.help.instagram.com/519522125107875)

We use LinkedIn for professional networking and career development. We do not control how LinkedIn processes personal data when you contact us or interact with us by using this platform. LinkedIn is the data controller, and it has its own policies and terms of use. For more information, please visit LinkedIn's privacy notice at [www.linkedin.com/legal/privacy-policy?trk=homepage-basic\\_footer-privacy-policy](http://www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy)

We use Pinterest for image sharing and social media service. We do not control how Pinterest processes personal data when you contact us or interact with us by using this platform. Pinterest is the data controller, and it has its own policies and terms of use. For more information, please visit Pinterest's privacy notice at [www.policy.pinterest.com/en-gb/privacy-policy](http://www.policy.pinterest.com/en-gb/privacy-policy)

It may also be processed by companies operating outside the EEA who work for us or for one of our service providers. If we do this, we ensure that your privacy rights are respected in line with this Policy and the same protection is given to your personal information as laid down by the DPJL.

## Data Security

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We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Colleagues, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our Data Protection Lead (DPL).

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

## Data Retention

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We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

You can request our [Data Retention Schedule](#) from our DPL if required.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## Rights of Access, Correction, Erasure, and Restriction

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It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, please contact our DPL at [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com)

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

## How to request your information and what we may need from you

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Please use the [Data Subject Access request form](#), available [here](#). This form will guide you through the information we require from you and who to send the form to. If you have any questions about this process or any of your rights, please contact our DPL at [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com).

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

This is another appropriate security measure to ensure that personal information is not

disclosed to any person who has no right to receive it.

We will respond to your request within **4 weeks** after and upon satisfactory verification of your identity.

## Right to Withdraw Consent

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In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our DPL at [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## Changes to this Privacy Notice

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We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or requesting you to confirm the accuracy of the information we hold on you.

## Complaints

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We would like the chance to resolve any complaints you have about the way we process your information; however, you do have the right to complain to the Jersey Office of the Information Commissioner about how we have used your personal data.

Upon receipt of a Complaint about one of the products or services we offer it may be required that we share your data and the subject of the complain with a supplier or producer of the product or service you have complained about. This is part of the investigation into your complaint and we can assure you that your data will be protected as well as it is outlined in the notice.

If you do not want your data shared with a supplier or producer of the product or service you want to complain about, please inform the member of staff taking your Complaint, or email our DPL at [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com)

The details for each of these contacts are:

### **Aruna Therapy – Data Protection Lead**

Suite 18, Bourne House, Francis Street, St Helier, Jersey, JE2 4QE

Telephone +44 (0) 7797 766264 or email [karina.ferey@arunatherapy.com](mailto:karina.ferey@arunatherapy.com)

### **Office of the Information Commissioner – Jersey**

2nd Floor, 5 Castle St, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or Email: [enquiries@dataci.org](mailto:enquiries@dataci.org)