



## Privacy Policy

*Confidentiality and respecting your personal information is paramount. Whilst this is a lengthy document, it is important that we are clear about our responsibilities and processes when collecting and storing your personal information. Please take the time to read this prior to agreeing to working with us.*

### **1. Important information and who we are**

#### *Purpose of this privacy policy*

This privacy policy aims to give you information on how The Compass Project collects and processes your personal data through your use of our website and the use of our services and treatments.

Our website is not intended for children and we do not knowingly collect data relating to children via our website.

It is important that you read this privacy policy 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 policy supplements other notices and privacy policies and is not intended to override them.

#### *Controller*

Dr Liam Shine, Clinical Director of The Compass Project, is the data controller and is responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Associate psychologists taking on referrals with The Compass Project will be additional data controllers for the clients they work with directly and may have access to more data than Dr Liam Shine due to the confidential nature of their therapy work with a specific client. In such cases, associates will be the primary data controller for those clients.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### *Contact details*

If you have any questions about this privacy policy or our privacy practices, please contact our DPO by email at [liam@thecompassproject.ie](mailto:liam@thecompassproject.ie)

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

We keep our privacy policy under regular review. This version was last updated in December 2023.

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 policy of every website you visit.

## **2. What personal data we process**

The Compass Project collects and processes the following personal data:

- Personal data - basic contact information such as name, address, email, contact number and GP contact details.
- Sensitive personal data - relevant medical records, therapeutic records (therapist notes, letters, reports and/or outcome measures).
- If you complete a web-based enquiry or intake form we will also collect any information you provide to us as well as your internet protocol (IP) address. This is automatically supplied by the website software used to offer the form. All web services used by The Compass Project are verified by themselves as GDPR compliant.

If you are referred by a health insurance provider, then we will also collect and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment.

### **3. The lawful basis for processing personal data**

The Compass Project has a legitimate interest in using the personal data and sensitive personal data we collect to provide healthcare treatment. It is necessary for us to provide psychological assessment and therapy to clients.

We may also ask for information on how you found our service for the purpose of our own marketing research. No information you provide is passed on without your consent. *We will never sell your information to others.*

### **4. What we do with your personal information**

The Compass Project takes your privacy very seriously. We will only use your personal information to provide the services you have requested from us.

If you do not provide the personal information requested, then we may be unable to provide a service to you.

## **5. How long we store personal information**

We will only store your personal information for as long as it is required.

The sensitive personal data defined above is stored for a period of 7 years after the end of an engagement. After this time, this data is deleted at the end of each calendar year.

## **6. How your personal information is used**

We use the information we collect to:

- Provide our services to you.
- Process payment for such services.
- Send you information and information about our services that might be of interest to you. You have the right to opt-out at any time, and request that your personal contact information is deleted to prevent future proactive contact from ourselves.

## **7. Who we might share personal information with**

We hold information about each of our clients and the intervention they receive in confidence. This means that we will not normally share your personal information with anyone else. However, there are exceptions to this when there may be need for liaison with other parties:

- If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, then we will share appointment schedules with that organisation for the purposes of billing. We may also share information with that organisation to provide treatment updates.
- In cases where treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.

In exceptional circumstances, we might need to share personal information with relevant authorities:

- When there is need-to-know information for another health provider, such as your GP.

- When disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty, for example a Court Order.
- When the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.

## **8. What we will NOT do with your personal information**

We will not share your personal information with third-parties for marketing purposes.

## **9. How we ensure the security of personal information**

Personal information is minimised in phone and email communication. Email applications use private (SSL) settings, which encrypts email traffic so that it cannot be read at any point between our computing devices and our mail server. The Compass Project will never use open or unsecure Wi-Fi networks to send any personal data.

Personal information is stored on a cloud-based system that undergoes several independent third-party audits on a regular basis to verify security, privacy and compliance controls. The system adheres to ISO 27001 and 27018 industry standards and complies with data protection regulations including GDPR, HIPAA and the EU Data Protection Directive. It offers robust security features encompassing data loss prevention, data encryption, malware, spam and phishing defences and single sign-on (SSO).

Malware and antivirus protection is installed on all computing devices. Mobile devices are protected with a passcode/thumbprint scanner, mobile security, antivirus software and two-factor authentication.

## **10. Your right to access the personal information we hold about you**

- You have a right to access the information we hold about you.
- We will usually share this with you within 30 days of receiving a request.
- There may be an administrative fee for supplying the information to you.
- We may request further evidence from you to check your identity in the event of such a request.
- You have a right to have your personal information corrected if it is inaccurate.
- You can complain to a regulator. If you think that we haven't complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office.

The Compass Project reserves the right to refuse a request to delete a client's personal information where this constitutes therapy records. Therapy records are retained for a period of 7 years in accordance with the guidelines and requirements for record keeping by The Psychological Society of Ireland, The British Psychological Society and The Health and Care Professions Council (HCPC).