



Privacy Notice

1. Purpose

This privacy notice provides details of the kind of personal data we collect, why we collect it and what we do with it.

We are the Psychotherapy Institute, which is a trading style of Susie Hewitt Training & Consultancy Ltd a Company registered at Companies House with Company Number 14624799.

We are registered with the ICO and our Registration Number is ZB789535.

2. Contact Details

Telephone 07946 859 773

Email office@psychotherapyinstitute.co.uk

Please note that we do not have facility for paper documents to be delivered to our offices and any correspondence should be sent electronically to the above email address.

3. What information we collect, use and why

We collect or use the following information **for student education and welfare:**

- Names and contact details for students
- Gender
- Pronoun preferences
- Date of Birth
- Dietary requirements (including vegetarian, vegan, gluten free and halal requirements)
- Payment details and financial information including transactions
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special education needs and disabilities)
- Photographs
- Attendance and reason for absence data
- Exam results and qualifications
- Progress reports
- Information relating to compliments and complaints

Commented [C1]: The footer date (November 2025) is now several months old given the other gaps flagged in this review, so worth updating once revised. Also consider naming a specific data protection contact for rights requests/queries (as distinct from the general enquiries address above) and noting when your ICO registration is next due for renewal - both are quick, low-risk additions commonly expected by reviewers/auditors.

Commented [C2]: The reply-to link in this section points to enquiries@psychotherapyinstitute.co.uk, but the address shown to the reader is office@psychotherapyinstitute.co.uk. Please confirm which is correct and make them consistent.

We also collect or use the following information **for student education and welfare:**

- **Health information**

We collect or use the following personal information **for dealing with queries, complaints or claims:**

- Names and contact details
- Address
- Payment details
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

We collect or use the following information **for information updates or marketing purposes:**

- Names and contact details
- Address
- Marketing preferences
- Photographs
- **Website user journey information**
- IP addresses

We collect or use the following information **for recruitment purposes:**

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of Birth
- National Insurance Number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information
- Details of any criminal convictions (e.g. DBS, Access NI or Disclosure Scotland checks)

Commented [C3]: This notice doesn't yet state a separate Article 9 UK GDPR condition for the special category data collected here (health information; SEND/disability information; and, in the recruitment table, gender/pronoun and criminal offence data under Article 10). A lawful basis under Article 6 (e.g. Consent, Contract) is not enough on its own for special category or criminal offence data - a distinct condition is needed, and for criminal offence data an 'Appropriate Policy Document' under DPA 2018 Schedule 1 is normally also required. Recommend confirming the specific condition(s) relied on with your data protection adviser and adding them here.

Commented [C4R3]: Added: explicit consent as the Article 9 condition for health/SEND/gender data, and the Article 10/Schedule 1 condition plus Appropriate Policy Document reference for criminal offence data (recruitment). Please double-check the specific Schedule 1 condition named ("employment" ground) matches how your Appropriate Policy Document is actually worded.

Commented [C5]: You collect 'Website user journey information' and 'IP addresses' here, but the notice has no cookies/tracking-technologies section and PECR (the UK's e-privacy rules) requires separate information and, for non-essential cookies, consent, usually via a cookie banner and a linked cookie policy. Recommend adding a short section (or linking to a standalone cookie policy) describing what's used and how visitors can control it.

4. Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out below in brief. You can find out more about your data protection rights and exemptions which may apply on the ICO’s website.

Your right of access

You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.

Your right to rectification

You have the right to ask us to correct personal information you think is inaccurate, and to have incomplete personal information completed.

Your right to erasure

You have the right to ask us to delete your personal information.

Your right to restriction of processing

You have the right to ask us to limit how we can use your personal information.

Your right to object to processing

You have the right to object to the processing of your personal data.

Your right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.

Your right to withdraw consent

When we use consent as our lawful basis you have the right to withdraw your consent at any time.



If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

5. Our lawful bases for the collection and use of your data

Our lawful bases for collecting us using personal information **for student education and welfare** are:

Consent

We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract

We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Explicit consent (special category data)

Where we collect health information, Special Educational Needs and Disabilities (SEND) or additional support information, or gender/pronoun information, this is special category data under Article 9 UK GDPR. In addition to the lawful basis above, we rely on your explicit consent as our Article 9(2)(a) condition for processing this information. You can withdraw this consent at any time using the contact details at the top of this notice; this will not affect the lawfulness of processing carried out before you withdraw it, but may affect our ability to provide certain support or reasonable adjustments.

Our lawful basis for collecting or using personal information **for dealing with queries, complaints or claims** are:

Contract

We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful basis for collecting or using personal information **for information updates or marketing purposes** are:

Legitimate interests

We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

To update or market to individuals who may be (or have previously expressed an) interest in attending one of our courses and we are running the same course or a similar course, or a course which we believe may be of interest to them at another time or covering a similar or connected topic.

Our lawful basis for collecting or using personal information **for recruitment purposes** are:

Legitimate interests

We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:

To make an informed decision about whether to interview a prospective candidate for an advertised role and/ or to make an informed decision post-interview as to whether we are able to make an offer of employment to an applicant for an advertised role.

Criminal offence data

Details of criminal convictions (e.g. DBS, Access NI or Disclosure Scotland checks) are criminal offence data under Article 10 UK GDPR. Our condition for processing this data, under Schedule 1 of the Data Protection Act 2018, is that it is necessary for us to exercise a right or obligation conferred by law in connection with employment. We maintain an Appropriate Policy Document covering this processing, as required by Schedule 1, a copy of which is available from us on request.

6. Where we get personal information from

Directly from you

7. How long we keep information

We keep information relating to **student education and welfare** for 7 years.

We keep information relating to **queries, complaints and claims** for 7 years.

We keep information for **information updates and marketing purposes** for 7 years.

Commented [C6]: Every category here is given the same flat 7-year retention period, including complaints correspondence and marketing/updates data. ICO guidance expects retention to be justified per purpose (e.g. why marketing data needs 7 years when someone could unsubscribe tomorrow), not a single blanket figure. Recommend reviewing each row against your actual retention schedule and adding a short 'because...' rationale for each (e.g. limitation periods for contract/negligence claims, professional body record-keeping requirements, etc.).



We keep information for **recruitment purposes** for 7 years.

8. Who we share information with

Others we share personal information with:

- Examination boards and bodies
- Organisations we need to share information with for safeguarding reasons
- External auditors or inspectors

9. How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this Privacy Notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>