# **Privacy Policy**

#### Who We Are

https://www.personalonlinetherapy.com

#### **Our Contact Details**

Web: <a href="https://www.personalonlinetherapy.com">https://www.personalonlinetherapy.com</a>

Mail (general email): <a href="mailto:info@personalonlinetherapy.com">info@personalonlinetherapy.com</a>
Mail (privacy related): <a href="mailto:privacy@personalonlinetherapy.com">privacy@personalonlinetherapy.com</a>

Mail (complaints related): <a href="mailto:complaint@personalonlinetherapy.com">complaint@personalonlinetherapy.com</a>

#### **Personal Data We Process**

We (personalonlinetherapy.com) process the personal data specified below which we receive due to you visiting our website and/or you providing this personal data via the contact form on our website, in an e-mail you sent to us and/or via any other forms of contact.

#### **Overview Personal Data We Process**

#### **Category - Website Visit**

- Information about your activities on our website
- Internet browser and device type
- Location data

When visiting our website, the information above will be processed using Google Analytics. We have configured Google Analytics to make sure your data is not shared with Google. Read more about "Cookies" below.

### **Category - Completed contact form (or other method of contact)**

- First and last name (or alias)
- E-mail address
- Other personal data that you actively provide in the contact form, by mail or other correspondence (this could be medical data)
- IP address
- \* If you fill out our contact form, or send us an email, the information above will be processed. You can choose for anonymous therapy as well (by using an anonymous email address, not specifying your name and using an alias instead et cetera). We process your IP-address in order to know where you are located, so we can match you to a therapist in the same time zone.

#### **Category - Treatment**

If you start online therapy with us, no additional personal data is required. We will match you to one of our freelance psychologists, with whom we have a processing agreement to secure your personal data.

This freelance psychologist will create a 'medical file' for his/her therapy notes (as required by law), which means he or she will start processing data concerning your mental health.

The freelance psychologist will not share this medical file with anyone else. Only when you give specific permission for this and / or if there are legal reasons to do this. Only your personal psychologist will have access to your medical file.

## Special and / or sensitive personal data that we process

We (personal online the rapy.com) process the following special and / or sensitive personal data of you:

- Mental health / medical data

This is solely for the purpose of being able to offer you our service: online therapy. The legal basis for this is 'agreement'.

## For what purpose and on what basis we process personal data

We (personalonlinetherapy.com) process your personal data for the following purposes:

- To be able to contact you via e-mail to offer our service
- To be able to deliver services to you (online therapy)
- To be able to process your payment (to send an invoice to your email address)

The legal basis for this is 'agreement'.

### How long we keep your personal data

We do not store your personal data for longer than is strictly necessary to realize the purposes for which your data is collected.

## We use the following retention periods for the following personal data

- First and last name 12 months after the last moment of contact
- Email address 12 months after the last moment of contact
- Other personal data that you have actively provided in the contact form, by email or via other correspondence 12 months after the last moment of contact

Our reason to keep this data for 12 months (after the last moment of contact) is that our experience is that clients sometimes pause the therapy and reach out to us later on. It has proven useful for the client and the psychologist to have this information at hand (e.g. the client's initial registration email) in order to guarantee the best possible treatment.

#### Medical file

According to medical law (WGBO) healthcare providers (i.e. psychologists) are required to keep a medical record of their clients. One of the regulations is that a medical record must be kept for at least 15 years after the treatment has been closed.

### Sharing of personal data with third parties

We (personalonlinetherapy.com) have to share some of your personal data with third parties to realize our service, guarantee good practice, marketing purposes and to comply with legal obligations. We have a processing agreement with all these third-parties to ensure the same level of security and confidentiality of your data.

Name Third-Party	Product	Purpose	What Data
One.com	Hosting	Website hosting & email	All data you send via email or via our contact form will go via One.com's mailserver.
Google	Analytics	Statistics	<ul> <li>Information about your activities on our website</li> <li>Internet browser and device type</li> <li>Location data</li> </ul>
Clinical coordinator	Administration	Contact with (potential) clients, matching client with psychologist & invoicing	Name, email and other information you supply us with in email or contact form.
Freelance psychologist)	Online therapy	Online therapy	Name, email and other information you supply us with in email or contact form.
Skype* or Facetime*	VoiP	Online therapy	Image & audio during your therapy sessions
Moneybird	Invoicing	Invoicing	Name & email address

<sup>\*</sup>Skype is part of Microsoft and supports the US-EU Privacyshield.

## Cookies, or similar techniques, that we use

We (personalonlinetherapy.com) only use technical, functional and analytical cookies that do not infringe your privacy. A cookie is a small text file that is stored on your computer, tablet or smartphone when you visit our website for the first time. The cookies we use are necessary for the technical operation of the website and your ease of use. They ensure that the website works properly and, for example, remember your preferred settings. We also use this to optimize our website (experience). You can opt out for cookies by setting your internet browser so that it no longer stores cookies. In addition, you can also delete all information that was previously saved via the settings of your browser. We have configured Google Analytics so that your data is not shared with Google.

<sup>\*</sup>Facetime is part of Facebook and supports the <u>US-EU Privacyshield</u>.

## View, modify or delete data

You have the right to view, correct or delete your personal data. In addition, you have the right to withdraw your consent for data processing or to object to the processing of your personal data by us (personalonlinetherapy.com) and you have the right to data transferability. This means that you can submit a request to receive your personal data.

You can send a request for access, correction, deletion, data transfer or any other request to: <a href="mailto:privacy@personalonlinetherapy.com">privacy@personalonlinetherapy.com</a>

To ensure that this request is coming from you, we request that you send a copy of proof of identity together with the request. To protect your privacy, you can erase (e.g. make black) your passport photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), passport number and/or citizen service number. We will respond to your request as quickly as possible, but within four weeks. We also like to point out that you have the possibility to submit a complaint. For this, contact: <a href="mailto:complaint@personalonlinetherapy.com">complaint@personalonlinetherapy.com</a>

### How we protect personal data

We (personalonlinetherapy.com) take the protection of your data very serious and take appropriate measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized changes. For example, we use encryption, two-step authentication wherever possible and we are constantly improving our security and privacy measures. If you feel that your data is not properly protected or there are indications of abuse, please contact our customer service or via:info@personalonlinetherapy.com