

CASPARI FOUNDATION PRIVACY POLICY STATEMENT

Following guidelines on general data protection (GDPR):

1. The Caspari Foundation will hold a Membership Data Base and files relating to clients on its main computer.
2. The Data Controller will be the Administrator, and entry to this data base will be by password.
3. The Caspari Foundation will follow UKCP guidelines on data protection, as seen in <https://www.psychotherapy.org.uk/wp-content/uploads/2017/11/ukcp-data-protection-policy.doc>
4. The Caspari Foundation will ask for informed consent to collect personal data from members and from clients.
5. Personal data will be kept safe and secure, and will be protected from unauthorised access or alteration.
6. The Board of Trustees will be able to access relevant files under the following circumstances; There is a legitimate reason related to their trustee duties; Access aligns with the charity's data protection policy and privacy agreements; Proper security measures are in place to protect the data (eg. Password protected). Files related to clients marked as for Safeguarding may only be viewed by the Designated Safeguarding Lead.
7. The chair, trustees and all staff who are given access to the data base and to these files have a duty of confidentiality. All staff requiring access to information will be appropriately trained to do so and will need to apply to the Data Controller to obtain a password to the relevant file or sub-file.
8. Personal data in files relating to Clients will be kept no longer than 30 days after it is determined that holding

this data is no longer necessary, and in any event, for no longer than seven years. For Student Records, they may be kept no longer than 30 days after it is determined that holding this data is no longer necessary for the purposes for which the personal data was being held. The person to whom the data refers may request its deletion at any time in terms of the “right to be forgotten” legal ruling.

- i. All clients, members and employees are entitled to see a copy of data stored about themselves.
- ii. Any requests for removal of personal data will be considered, but there is no automatic right to such erasure.

9. The Caspari Foundation will respond to any requests to to see such information as soon as is possible and in any event within 30 days of such requests being made in writing or by email.

10. In situations where, in terms of the Safeguarding Policy, personal safety of a child is at risk, personal data can be shared. Otherwise, personal data cannot be shared beyond the requirements of points 1 to 11 above. This is in line with the document “Working Together to Safeguard Children, HMG Draft, 2018, Information Sharing, points 23-26.

11. If, despite the above, procedures, any breaches or potential breaches of personal data occur (for example, should the computer system be broken into), these will be reported to the ICO immediately.

12. All personnel working independently for The Caspari Foundation need to appraise themselves of The Caspari Foundation and UKCP regulations on data protection, and confirm in writing to The Caspari Foundation that they have done so.

13. All therapists and students working on behalf of the Caspari Foundation in settings such as schools or clinics will need to be conversant with the data protection

policies of the organisations with which they are working, and need to state such in writing to the Data Controller.

14. All students for the advanced diploma at the Caspari Foundation will need to refer to the Course Director for data protection guidance, as well as abiding by the guidance of any clinic at which they are working.

15. **Data Collection and Usage by Wix**

a. The Caspari Foundation website is hosted on the Wix.com platform. Wix provides us with the online platform that enables us to showcase our services, resources, and initiatives. As a website hosted on Wix, certain data is automatically collected and processed by Wix when you visit or interact with our website.

b. **Data Collected by Wix**

Device and Connection Information: Wix may collect technical information about your device, such as IP address, browser type, operating system, and device type.

Usage Information: Wix tracks user interactions on the website, including pages viewed, session duration, and navigation patterns.

Cookies and Tracking Technologies: Wix uses cookies and other tracking technologies to collect information about your browsing behavior, preferences, and login sessions. For more details, please refer to Wix's Cookie Policy.

c. **How Wix Uses This Data**

Website Performance: To ensure the website operates smoothly and provides a seamless user experience.

Security and Fraud Prevention: To monitor and safeguard the website against malicious activity.

Analytics and Insights: To provide anonymized analytics that help us understand website traffic and visitor engagement.

Personalization: To customize your browsing

experience based on your preferences and past interactions.

d. **Sharing of Data by Wix**

Wix may share collected data with third-party service providers to facilitate its services, such as analytics tools or payment processors (if applicable). These third parties are required to comply with data protection laws and regulations.

e. **Your Data Rights**

As a visitor to a Wix-hosted website, you have rights regarding your personal data. You can manage cookie preferences, withdraw consent for data collection, or request more information about Wix's data practices. For more information, visit Wix's [Privacy Policy](#).

- f. If you have any questions about how Wix collects or processes your data, please contact us at hello@caspari.org.uk or refer to Wix's support channels.

16. The Caspari Foundation is registered with the Information Commissioner's Office and obtains a Data Protection Registration certificate.