

# Privacy Policy



**Last updated 12 December 2025.**

This privacy notice for Wellbeing First Aid Ltd ('**Company**', '**we**', '**us**', or '**our**'), describes how and why we might collect, store, use, and/or share ('**process**') your information when you use our services ('**Services**'), such as when you:

- Visit our website at <https://wellbeingfirstaid.co.uk/>, or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at [info@wellbeingfirstaid.com](mailto:info@wellbeingfirstaid.com)

## 1. WHAT INFORMATION DO WE COLLECT?

### **Personal information you disclose to us**

***In Short:** We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Personal Information Provided by You.** The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- email addresses
- names

- postal addresses
- phone numbers
- contact preferences
- accessibility requirements

### **Sensitive Information.**

If you use our counselling services, we may collect and process special category data, such as information about your mental health, wellbeing, and any relevant background you choose to share with us. This includes session notes and assessment information. We process this information with your explicit consent and in accordance with applicable laws and ethical guidelines.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

***In Short:*** *Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To deliver and facilitate delivery of services to the user.** We may process your information to provide you with the requested service.
- **To respond to user enquiries/offer support to users.** We may process your information to respond to your enquiries and solve any potential issues you might have with the requested service.
- **To send administrative information to you.** We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.

- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To send you marketing and promotional communications.** We may process the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of our marketing emails at any time. For more information, see '[WHAT ARE YOUR PRIVACY RIGHTS?](#)' below.
- **To deliver targeted advertising to you.** We may process your information to develop and display personalised content and advertising tailored to your interests, location, and more.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.
- **To determine the effectiveness of our marketing and promotional campaigns.** We may process your information to better understand how to provide marketing and promotional campaigns that are most relevant to you.
- **To save or protect an individual's vital interest.** We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

### 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

***In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.*

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Consent.** We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time.

- **Performance of a Contract.** We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you. This includes limited administrative processing necessary to manage appointments, communication, and service delivery.
- **Legitimate Interests.** We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms. For example, we may process your personal information for some of the purposes described in order to:
  - Send users information about special offers and discounts on our products and services
  - Develop and display personalised and relevant advertising content for our users
  - Analyse how our Services are used so we can improve them to engage and retain users
  - Support our marketing activities
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.** We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- **Explicit Consent** (special category data). Where we process special category data such as health-related information for counselling purposes, we will do so with your explicit consent as required by Article 9(2)(a) of UK GDPR. This means you will be asked to agree in writing to us collecting and using this information as part of the counselling agreement.
- **Vital Interests.** We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

#### 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

***In Short:*** We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

- **To provide counselling services.** If you engage in counselling with us, we process your personal and special category information (such as mental health details and session notes) to deliver therapeutic services safely and effectively, and to comply with legal and ethical responsibilities as a counsellor.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Service providers** We may share limited personal information with trusted third-party service providers who support the running of our business. This includes website hosting providers (such as Wix), and email marketing platforms, secure clinical record systems (such as WriteUpp), and administrative or virtual assistant services, to help us operate and communicate with you effectively.
- **Administrative support** Where administrative support is used, this access is strictly limited to what is necessary for tasks such as managing email enquiries, scheduling appointments, and general administration. This may include access to names, email addresses, and appointment-related information.

Administrative support providers do not have access to counselling session notes, clinical records, or therapeutic content, which are stored separately in secure, GDPR-compliant systems and accessed only by their counsellor.

All service providers are subject to written contracts that require them to keep your information confidential, process it only on our instructions, and comply with UK data protection law.

- **Professional supervision and continuity of care** As part of our professional and ethical responsibilities, we have arrangements in place to support continuity of care in the event that the therapist becomes unexpectedly unavailable due to illness, incapacity, or death.

In these circumstances only, limited personal information (such as a client's name and contact details) may be shared with the therapist's clinical supervisor for the sole purpose of contacting clients to inform them of the situation, support appropriate endings, or provide information about alternative sources of support.

The supervisor is a qualified counselling professional and is bound by professional confidentiality and data protection obligations. No counselling session notes or clinical records are shared as part of this process.

## **5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

***In Short:** We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in Wix's Cookie Notice, which will appear on your first visit to our site.

## **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will retain personal information for the following periods, based on the type of data:

- **Contact details for marketing purposes:** Up to 2 years after your last interaction with us.
- **Transactional records (for tax purposes):** 7 years.
- **Website usage data:** Retained for 1 year for analytical purposes, unless anonymised.
- **Counselling records:** Retained securely for 7 years after the end of therapy (or until the client turns 25 if under 18 at time of sessions), in line with professional guidance.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organisational and technical security measures.*

We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Counselling records and notes are stored securely using encrypted systems, password-protected files, or secure GDPR-compliant platforms. Only the therapist has access to this information. Where administrative or virtual assistant support is used, access is restricted to business systems such as email and calendars only and does not include access to counselling records or clinical systems. Any paper records (if used) are anonymised and stored in a locked cabinet accessible only by the therapist.

In the event of a personal data breach, we will notify the relevant supervisory authority within 72 hours and inform you if the breach poses a high risk to your rights and freedoms.

## **8. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*



We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [kate@wellbeingfirstaid.com](mailto:kate@wellbeingfirstaid.com).

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:*** *In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

You have the right to:

- Request access to the personal information we hold about you.
- Request correction of inaccurate information.
- Request deletion of your personal information.
- Object to or request restrictions on the processing of your personal information.
- Withdraw consent to our use of your personal information at any time.

To exercise these rights, please contact us at [info@wellbeingfirstaid.com](mailto:info@wellbeingfirstaid.com)

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your [Member State data protection authority](#) or [UK data protection authority](#).

**Withdrawing your consent:** If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

**Opting out of marketing and promotional communications:** You can unsubscribe from our marketing and promotional communications at any time by clicking on the unsubscribe link in the emails that we send, or by contacting us using the details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below. You will then be removed from the marketing lists. However, we may still communicate with you — for example, to send you service-related messages that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also [opt out of interest-based advertising by advertisers](#) on our Services.

If you have questions or comments about your privacy rights, you may email us at [info@wellbeingfirstaid.com](mailto:info@wellbeingfirstaid.com)

## 10. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **11. DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:*** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) , Kate O'Leary, by email at [info@wellbeingfirstaid.com](mailto:info@wellbeingfirstaid.com), by phone at 07488307355.

## **13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

You have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please fill out and submit a [data subject access request](#).

## 14. COMPLAINTS PROCEDURE

In case of any complaints or concerns about how your data is processed, we encourage you to contact us first so we can resolve your issue. Here's how you can lodge a complaint:

**1. Contact Us:**

Email us at [info@wellbeingfirstaid.com](mailto:info@wellbeingfirstaid.com) with details of your complaint. We'll aim to acknowledge your complaint within 5 working days. If your query relates to counselling or therapy data specifically, please mention this in your message so we can direct it appropriately.

**2. Investigation:**

We will investigate your complaint and aim to respond with a resolution within 30 days. In more complex cases, we may need more time, and we will notify you accordingly.

**3. Escalation:**

If you are not satisfied with our response, you can escalate your complaint to the Information Commissioner's Office (ICO) in the UK by visiting <https://ico.org.uk/make-a-complaint> or calling their helpline at 0303 123 1113.

## 15. COUNSELLING SPECIFIC INFORMATION

If you access our counselling services, we will collect and store information you provide before and during therapy sessions. This may include personal history, health information, GP details, emergency contact details, session notes, and any relevant personal experiences you choose to share.

For clarity, while some administrative tasks may be supported by trusted third-party providers (such as managing enquiries or appointments), counselling session content, clinical notes, and therapeutic records are handled solely by the therapist and are not shared with administrative support providers.

Because some of the information I hold relates to your mental health, this is classed as special category data. I process this under UK data protect law, specifically: Article 9(2)(h) of the UK GDPR – the provision of health or social care or treatment.

We only process this "special category data" with your explicit consent, and in accordance with our professional and legal responsibilities. This information will not be shared with third parties unless:

- You provide explicit consent,

- We are legally required to do so (e.g. by court order),
- There is a safeguarding concern that requires breaking confidentiality to protect you or someone else from serious harm.

Kate O'Leary is a registered member of the British Association for Counselling and Psychotherapy (BACP) and adheres to their Ethical Framework for the Counselling Professions.

As part of ethical practice and continuity planning, arrangements are in place with the therapist's clinical supervisor to allow limited contact with clients in the event of the therapist's sudden unavailability. This would involve sharing contact details only, and only where necessary to protect clients' wellbeing and ensure appropriate communication.

We store session records securely in compliance with BACP ethical guidelines and ICO standards. We retain therapy records for seven years after the end of our work together, unless required by law to keep them for longer.

