

PRIVACY & COOKIE POLICY

WE EXPECT ALL REGISTERED USERS OF OUR SITES TO CONDUCT THEMSELVES WHILST ON OUR SITES OR SOCIAL MEDIA PLATFORMS IN AN APPROPRIATE MANNER BEARING IN MIND THE PURPOSE OF THE PLATFORMS - TO ASSIST YOUNG PEOPLE IN RECEIVING APPROPRIATE PROFESSIONAL SUPPORT AND EDUCATIONAL ESTABLISHMENTS TO MAKE EFFECTIVE USE OF THEIR BUDGETS IN THIS AND OTHER AREAS. ANY REGISTERED USER WHO FAILS TO DO SO MAY BE IMMEDIATELY RESTRICTED AND/OR HAVE THEIR ACCESS REMOVED. THE DECISION ON THIS RESTS WITH US AND IS FINAL.

ALL USERS ARE REQUIRED TO ACCEPT OUR TERMS & CONDITIONS OF ACCEPTABLE AND APPROPRIATE USE.

Our aims are to:

- provide relevant information to all registered users;
- to use information we hold to allow effective use of the Sites by its users;
- enable effective and secure access to both Professionals and Commissioners to the Sites;
- strive to improve the support given to young and/or vulnerable people in our communities;
- help Educational establishments and other providers of education and care to maximise the effective use of their budgets, and
- promote TAC Access Limited and our services.

The UK has legislation that governs the use of personal data. We refer to this as UK GDPR throughout this policy.

UK GDPR sets out a number of key principles

- Lawfulness, fairness and transparency.
- Purpose limitation.
- Data minimisation.
- Accuracy.
- Storage limitation.
- Integrity and confidentiality (security).
- Accountability.

'Site' or 'Sites' in this policy means:

- TAC Access website(s);
- TAC Access Database(s);
- TAC Access Social Media platform(s);
- & all other associated media.

PLEASE NOTE

- Every care has been taken in the compilation of the information on the Sites.
- We do not endorse any externally linked sites and are not responsible for their content. Users should note that some external providers may use premium rate telephone numbers. We do not use premium rate numbers.
- You should not assume that this website is error-free. There may be occasions where information is inaccurate or incomplete. You can help us to correct this by reporting it to support@tacaccess.com
- We will not be responsible for errors or omissions in the Sites, or other documents which are referenced by, or linked to, this website other than those which occur through our negligent or reckless action(s) or inaction(s).
- You may wish to take legal advice before proceeding.
- We attempt to ensure the accuracy of material but do not guarantee that any of its contents is virus-free. You must
 take your own precautions, as we accept no responsibility for any infection by virus or other contamination or by
 anything which has destructive properties. Please visit the <u>Get Safe Online</u> website for advice and further
 information.

- 1. TAC Access Limited ("TAC Access") is registered in England and Wales under Company Number 12995950. Our registered address is. Flat 21 5 Sloane Court East, London, England, SW3 4TQ. Throughout this policy we are referred to as "we" or "us" or "our"). We are the providers of the Sites, in particular the site located at https://www.tacaccess.com A reference to "you" or "your" refers to the user of the Sites.
- 2. This privacy notice helps you understand the personal data that TAC Access may collect from you and where inidicate this from third party sources. The privacy notice is relevant to all users of the site who are considering or actively commissioning therapy services and also children and young persons who may be clients in the provision of such services.
- 3. We are committed to protecting your privacy. This policy (referred to as the "Policy") explains how and for what purposes we use the information we collect and obtain about you. Please read this Policy carefully. By using the Site and any services we offer via the Site, you are where appropriate consenting to the processing of your data. You may withdraw your consent at any time by contacting us at support@tacaccess.com.
- 4. We may sometimes use your data to provide additional marketing or communication services but you can always opt out of this by telling us in writing. We do not send marketing emails from/via 3rd parties unless you explicitly opt into them and you may opt out at any time. We may share non-personally identifiable information publicly and with our partners. For example, we may share information publicly to show trends about the general use of our services.
- 5. We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.
- 6. This Policy only relates to the personal information that we collect about you from the Site or from third parties.
- 7. The Sites may contain links to other websites of interest. However, once you have used these links to leave the site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this policy. You should exercise caution and look at the privacy statement applicable to the website in question.
- 8. If you would like to opt out of marketing and communications from us and our nominated third parties, have any questions about this Policy or our use of your personal information, or if you wish to unsubscribe from marketing and communication messages from us or would like to submit a subject access request, please contact us via email to support@tacaccess.com or send a letter by post to our address in paragraph 1 above.
- 9. We will collect the information that you give to us when using the Site. If you choose to access a particular search feature or to fill in a form on the Site, you may be asked to provide information about yourself. The information collected includes but is not limited to your name, contact information including email address, demographic information such as postcode, and other information relevant to the services we provide.
- 10. We may also collect technical information that has the potential to identify you, such as the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also collect information about
 - your visit, including the full uniform resource locators (URL) clickstream to, through and from the Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page. We may combine technical information with other information that we have about you to help us with our processing of your information.
- 11. We retain access to all personal information (unless you have contacted us to request a deletion -such deletion will in all cases to be subject to our continuing needs to comply with any relevant safeguarding requirements in place from time to time and in connection with any regulatory, professional or legal matter or proceedings where we consider it necessary to retain the relevant data that we have collected from you or about you however this is securely deleted in accordance with the period set out in Schedule 1 or where relevant when we consider that the requirement to retain the data for regulatory, professional or legal reasons has ended.
- 12. Information we hold about you may be processed under the following lawful basis:

- As consented to by yourself or by an adult if you are under 13 years of age unless circumstances exist where we may accept and act on a consent given by a person under that age;
- in our legitimate interests as we provide the TAC Access service to you having considered the impact upon you as part of our consideration;
- where the vital interests of a data subject may be at risk and we process information in connection with those circumstances;
- when we have reason to believe the processing is necessary due to a legal requirement made of the Platform Operator.
- 13. We may also have links to other websites from the Site. We are not responsible for the content, security, privacy policies and practices of any other website, even if you access them using links from the Site. We recommend that you check the policy of each website that you visit and make sure that you are comfortable with the terms of such policies before providing any personal information. If our business is sold or merged, or if we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets. We will make sure that any such transfer is done in a secure way.
- 14. If we offer or supply a service to you that is provided on our behalf by a third party we may have to pass your information to them in order to deliver the service. By using the Site, you consent to us providing your information to the third parties authorised by us to provide such services. We may also use third parties to provide services on our behalf which may include processing (but not using themselves) your information e.g., to complete partial addresses or to augment the information we hold about you. In either case, we will not pass your information to anyone who is not also subject to adequate privacy commitments in our contract with them and we will not allow the third party to use your information for marketing purposes without your consent. We will not otherwise disclose, sell or distribute your information to any third party without your permission unless we are required to do so by law or to obtain professional advice. We will retain your information for as long as is reasonable and necessary and no longer than permitted by law please see Schedule 1.
- 15. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.
- 16. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- 17. We process your information for our legitimate interests and those of third parties while applying appropriate safeguards that protect your privacy. We require this information:
 - to understand your needs and provide you with a better service,
 - to meet relevant regulatory and best practice rules and guidance in relation to those that engage with young and/or vulnerable people, and/or
 - to deliver our services to Educational establishments and other providers of education and care.

We use your information in particular for the following reasons:

- Internal record keeping;
- Providing, maintaining and improving our services to meet the needs of our users and/or the young/and or vulnerable people;
- Developing new products and features that are useful for our users and/or the young/and or vulnerable peopl;e
- Understanding how people use our services to ensure and improve the performance of our services;
- Customising our services to provide you with a better user experience;

- Marketing to inform users about our services we may periodically send promotional emails about new products or special offers;
- Providing advertising, which may assist in keeping some of our services free (and when ads are personalised, we ask for your consent);
- Detecting, preventing or otherwise addressing safeguarding concerns, fraud, abuse, security or technical
 issues with our services (including disclosing information to government authorities and regulatory bodies
 when asked we will process and disclose your data when we have a legal obligation to do so eg if we are
 responding to legal/regulatory process);
- When we're providing a service and when we're complying with legal obligations;
- Various analytical, display, tag management processes as set out in Schedule 2.
- 18. You have the right to ask us not to process your personal data at any time. However, this will result in access to the Site being removed.
- 19. The Site, like many others, uses small files called cookies to help us customise your experience. Cookies are stored on the user's computer. Please do not use the Site unless you agree to the use of cookies. You can think of cookies as providing a 'memory' for a website, so that it can recognise you when you come back and respond appropriately. It is usually possible to stop your browser accepting cookies, or to stop
 - accepting cookies from a particular website. All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve the Site in order to tailor it to the user's needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 20. You may configure your browser to refuse or restrict the use of cookies. For example, in Internet Explorer, go to Tools > Internet Options. Please note that the website depends on cookies for proper functionality and you will not be able to use the website properly if your browser is configured not to allow cookies. In particular, if you refuse or restrict the use of cookies, you may be unable to access certain parts of the website.
- 21. The logos and artwork on the Sites are the copyright of TAC Access Limited and use of them is strictly prohibited without prior written authorisation from a director of TAC Access Limited.
- 22. All events are listed on the Site at our sole discretion. We reserve the right to reject or withdraw the listing of any event without explanation. We endeavour to provide up-to-date and accurate information, but we will not accept liability for the accuracy or currency of the information provided by third parties or for the content on any linked or related websites. Listings of promotional events on the Site should not be taken as an endorsement of that event of any kind by us. We will not accept liability for any consequences arising from your attendance at the events described. Before attending any event, we recommend you contact the event organiser, at the phone number provided, to confirm dates, locations, and other important information relating to the event.
- 23. Under data protection law you have rights in relation to the personal data we hold concerning you. Please consider whether we are the appropriate party to make your request to. We may not be controller of that data and the request should be made to any provider of therapy services where the request is associated with your relationship with that party. The rights are as follows:
 - A right to access the data you can ask for a copy of the personal data we hold about you and we are to respond to that request;
 - A right to have incorrect data rectified please help us keep personal data we hold up to date and should we request you reconfirm any data we hold please do so;
 - A right to be forgotten in certain circumstances you may ask for personal information we hold about you to be erased from our records. We may however have a legal obligation to keep you information which we could not do this either at all or in part we will advise you where this is the case with an explanation of reasons;
 - Right of portability if we hold certain types of information about you, you may have the right to have it transferred to another organization of your choice;
 - A right to object to processing of your data you have the right to object to certain processing activities that we have told you we may undertake such as direct marketing;
 - A right not to have important decisions about you being taken by automated process without any human

involvement.

We do not normally charge for requests for access to your data. We always try to respond within one month.

24. You have a right to raise concerns with the Information Commissioners Office.

If you have any concerns about the way we handle your personal data please do let us know by emailing at support@ tacaccess.com – we will be anxious to resolve any issues. However, in the alternative or if dissatisfied with the way we respond you are entitled to raise the matter with the Information Commissioner's Office at the following address:

Information Commissioner's Office

Wycliffe House,

Water Lane

Wilmslow

Cheshire SK9 5 AF

Phone: 0303 123 113 or 01625 545 745 Website: ico.org.uk/concerns/handling

Any changes we may make to this Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to this Policy. We will not reduce your rights under this Policy without your explicit consent. We will indicate the date when the last changes were published and we will maintain access to archived dated versions. If changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

SCHEDULE 1

PURPOSE FOR HOLDING AND DELETION (relating to platform users)

TYPE OF INFORMATION	REASON HELD	WHEN SECURELY DELETED
		When the platform user's account is closed
Names	I	When the platform user's account is closed
Email Addresses	l ·	When the platform user's account is closed
•	l '	When the provider closes their account
CYP school reference number and Alias	I	When the case is closed by the commissioner

NOTE

THE ABOVE IS SUBJECT ALWAYS TO OUR COMPLIANCE WITH <u>KEEPING CHILDREN SAFE IN EDUCATION</u> IF THERE IS A CONFLICT THEN KEEPING CHILDREN SAFE IN EDUCATION PREVAILS.

SCHEDULE 2

Analytics

Google Analytics (Google Ireland Limited) (only used in marketing site, not in the TACaccess platform)

Google Analytics is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of TAC Access Limited, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Tracker; Usage Data. Place of

processing: Ireland.