

IPTCA - Irish Play Therapy Community Association - PRIVACY POLICY

This policy is intended to help you understand what data we collect, how we use it, and your rights related to it. For purposes of this policy and unless otherwise specified, “data” includes data that is linked to one person or household including things like name, email address, phone numbers, device ID, Third-Party identifiers, contact information, communications with therapists using our digital communication platform (the “Platform”) to provide services (“therapists”), and IP address. Some jurisdictions might consider this to be “personal data,” “personally identifiable information,” or “sensitive personal data” in certain circumstances. When you use and access our app or website, you accept and agree to both the Terms and Conditions and this Privacy Policy, including that we’ll share certain data with service providers.

The purpose of this Policy is to explain the technical aspects of data Processing in a simple and clear way. Please feel free to email contact@iptca.ie if you have any questions about this Policy, or any suggestions for us to improve it.

This policy applies to any visitors to the public portions of our websites and apps, users of the members area portions of our Platform, and independent contractor therapists.

We define a Service Provider as a person or company that we have a legal agreement with to Process data collected by us or on our behalf. Data that is Processed on our behalf is required to be done only at our direction; no other person or company can authorise it. Our Service Providers are not permitted to disclose data that is individually identifiable to any other person or company, other than to us or the Service Providers’ own subcontractors (provided that they’re bound to data Processing terms that are no less restrictive than the terms the Service Provider is bound by).

The data obtained by Service Providers from their relationship with us must only be used for performing the services specified in our agreement with them, or as reasonably necessary to perform one or more of the following:

- Comply with applicable law, regulation, or legal process
- detect, prevent or mitigate fraud or security vulnerabilities
- debug to identify and repair errors impairing existing intended functionalities
- conduct internal research for technological development and demonstration of our products or services, if such use is reasonably necessary and proportionate to achieve the purpose for which the data was shared

For the purposes of this policy, a Third Party means an entity that is not a Service Provider, not a therapist or any other parties that are specifically called out in this Policy.

In this policy, we refer generally to activities done with data as “Processing.” Examples of Processing include collecting, storing, and using data. The categories of data which we Process are listed below. We Process this data to do things like operate the Platform and make sure you’re able to use our services effectively. We may also Process data to send you periodic emails or text messages. You can opt out of receiving texts or marketing communications at any time. Additionally, provided you opt-in and agree, we may Process and share some data with Third Parties for advertising purposes. You can find more details in the relevant sections of this policy.

Visitor Data

When you visit the website, app, or Platform, we Process information like the particular pages visited or which features you interacted with, the amount of time on the website or app, site/app/Platform errors, information about the type of device and browser you’re using, and IP address. We may Process your Third-Party identifier or advertising ID (if available based on the settings of your device) and will share it if you opt-in.

Onboarding Data

When an account is created with the Platform, the user fills out a questionnaire. We Process the information used to complete this questionnaire. Some of this information may include identifiers like email address, phone number, chosen name (first name or nickname), and physical address.

Account Registration Data

Once a user registers with the Platform, we Process data such as the account name the user selects, the email that they use, their age, phone number, emergency contact details, and whether a user verifies their email address. We also assign each user (including therapists) who creates an account a

Payment Information

We Process data about payment transactions on the Platform such as whether a user completed payment for our services, signed up for an event, received a discount or financial aid, or received any extensions or refunds.

Member Engagement Data

We Process data for logging into the Platform and activity conducted during that log in such as when a user logs in, the timing, number and length of messages received or sent through the Platform, the timing, number and duration of live session scheduled or conducted, the number and timing of use of other features such as worksheets, journals and goals. This category does not include Therapy Communications Data like the content of any messages sent or received by users, the content of any live sessions, or the content of journal entries, worksheets, or goals.

How we keep data secure.

We apply industry standards and strive to apply best practices to prevent any unauthorized access and disclosure. Internet-based services carry inherent security risks, but our systems infrastructure, encryption technology, operation and processes are all designed, built, and maintained with your security and privacy in mind.

IPTCA has an experienced team of data security professionals whose job it is to make sure we use secure technology to protect your data. We have numerous robust security practices such as:

- Our browsing encryption system (SSL) follows modern best practices.
- Our databases are encrypted and scrambled rendering them useless in the unlikely event that they are stolen or inappropriately retrieved.
- We have robust monitoring and alerting systems and procedures in place that include both automated systems and humans.

For your own security, keep the following in mind:

- Phishing: This is a type of online identity theft or account hacking. We will never request your login information or credit card information in any non-secure or unsolicited communication. You should always be diligent when you are asked to provide your account information and make sure it is in our secure system.
- Third-Party links: Our Platform may contain links to a Third-Party website or service. We do not control Third-Party websites, and do not have control over their privacy policies and terms of use. The fact that we link to a website is not an endorsement, authorization, or representation of our affiliation with that Third Party or of their privacy and security policies or practices

GDPR

This section provides additional information about our Policy relevant to you if you are from the European Economic Area (the EEA), United Kingdom, and Switzerland (together “European Area Countries”). It supplements and should be read in conjunction with the rest of the Policy.

Under the European Area Countries’ privacy laws, we are the Controller with respect to your data.

When is my data used?

- When it is in our legitimate interests or a Third Party’s legitimate interests (“legitimate interest” is a term defined by the General Data Protection Regulation (GDPR) and UK General Data Protection Regulation Notice). Our legitimate interests in this instance include managing the Platform and IPTCA’s business, safety and security of the infrastructure, prevention of fraud, research and development, and management of contracts and legal claims.
- When it is needed for the provision of the Platform. In particular, for product development and internal analytics purposes, and otherwise to improve the safety, security, and performance of the Platform. We only rely on our or a Third Party’s legitimate interests to Process your data when these interests are not overridden by your rights and interests.
- When it is necessary to do so to comply with any legal obligations imposed upon us, for example under our contractual obligation or applicable law.
- In rare instances, when it is a medical emergency, we may use your data to protect your or another’s vital interests if consent is not a reasonable option.
- When you have consented to the use of your data, for example for marketing purposes or through the use of cookies and web beacons. Where consent is the legal basis, you have the right to withdraw your consent at any time.

What Lawful Basis for Sensitive Data is Used in the UK and EEA?

About sensitive personal information:

IPTCA may also collect and process certain categories of personal information, which may be considered “sensitive personal information” in the UK and EEA. The lawful bases for this Processing are (1) health and social care, (2) our establishment, exercise, or defense of a right or legal obligation, (3) substantial public interest, and (4) consent. Where consent is the legal basis, you have the right to withdraw your consent at any time. Sensitive personal information that we Process includes your racial or ethnic origin, religious or philosophical beliefs, and data concerning your health or about your sex life or sexual orientation.

When you begin to use our services and register your account, we ask you to provide answers to a questionnaire to customize the service. In providing your responses to the questionnaire you may provide us with “sensitive personal Information” as described above. You may also continue to share such data with us as you receive services. This data is necessary as it allows us to continue providing services to you and customize our services for you and is necessary to provide administration with a personalized and well selected therapist based on points of data which impact your therapy and health care needs. The therapist also reviews this data and can choose to not work with you if they are not a good fit. We may also use this information to improve our service and understand how you interact with the services.

How we obtain your personal information

IPTCA obtains the categories of personal information listed above from the following sources:

- Directly from you, such as information when you apply to be a counselor or that you submit during the Process of using and paying for our Services.
- Indirectly from you, such as through your actions on our website.
- From Third-Party business partners, such as social media sites, ad networks, and analytics providers.
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What are my rights and choices under European Area Countries laws?

European Area Country residents have specific rights regarding their data. This section describes your rights if you are resident in the European Area Countries and explains how to exercise those rights.

- Subject access request: you may be entitled to ask us for a copy of any data which we hold. We will normally send you a copy within one month of your request. However, that period may be extended by two further months where necessary, taking into account the complexity of the

request or the difficulty in accessing the data that you request. There is usually no charge. In exceptional circumstances, we may charge a reasonable fee after discussing the fee with you.

- Right to rectification: if the data we hold about you is inaccurate, you may request rectification. The data will be checked, and, where appropriate, inaccuracies will be rectified.
- Right to erasure: in certain circumstances, you may be entitled to ask us to erase your data.
- Right to data portability: in certain circumstances, you may wish to move, copy, or transfer the electronic data that we hold about you to another organization.
- Right to object: you may object to your data being used for direct marketing. You may object to the continued use of your data in any circumstances where we rely upon consent as the legal basis for Processing it. Where we rely upon legitimate interests as the legal basis for Processing your data, you may object to us continuing to Process your data, but you must give us specific reasons for objecting. We will consider the reasons you provide, but if we consider that there are compelling legitimate grounds for us to continue to Process your data, we may continue to do so. In that event, we will let you know the reasons for our decision. In some instances, objecting to certain Processing may impact our ability to provide you with services.
- Rights related to automated decision-making including profiling: we use limited data to operate the Platform and to carry out certain profiling activities to support and grow our business. When doing so, we rely upon our legitimate interests as the lawful basis for Processing your data, and you may exercise the above rights if you do not wish us to Process your data in this way.

To exercise the rights in relation to your data set out in this section, please contact us at contact@iptca.ie.

IPTCA is an association of Play Therapists who are dedicated to establishing the highest standards of personal and professional conduct within the Play Therapy profession.