

Therapeutic Thinking Ltd

Privacy and Data Security Policy

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Purpose of the policy

Therapeutic Thinking Ltd. ("we", "our", "us") is committed to protecting and respecting your privacy. This policy explains how we collect, use, disclose, and safeguard your personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to ensuring the security and confidentiality of any personal information that we hold. Our website has been set up to assist schools, academies and other organisations, as well as parents and guardians, to obtain further information relating to Therapeutic Thinking.

We aim to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the expected provisions of the Data Protection Act 2018 (DPA 2018) as set out in the Data Protection Bill.

Our website contains several pages where you can provide us with information, for example, when you submit a testimonial, when you fill in one of our contact forms, or when you purchase the Planning Portal.

This Policy tells you:

- What personal information we collect about you
- How we collect your personal information
- How we use your personal information
- Who we may share your personal information with
- How long we keep your personal information
- What we do to protect your personal information
- What choices you have in relation to your personal information

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

Definitions

1. Personal Data

Any information relating to an identified or identifiable natural person ("data subject").

An identifiable person is one who can be identified, directly or indirectly, by reference to an identifier such as:

- A name
- An identification number
- Location data
- An online identifier (like an IP address)
- Or one or more factors specific to the person's physical, physiological, genetic, mental, economic, cultural, or social identity.

2. Special Category Data

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or data concerning health, sex life, or sexual orientation. Also includes genetic and biometric data (if used to identify someone).

3. Processing

Any operation or set of operations performed on personal data, whether or not by automated means.

This includes:

- Collecting
- Recording
- Organising
- Structuring
- Storing
- Altering
- Retrieving
- Using
- Disclosing
- Erasing or destroying data

4. Data Subject

The individual to whom the personal data relates. They are the person whose data is being collected and processed (e.g. the customer or website visitor).

5. Data Controller

The person or organisation that determines the purposes and means of processing personal data. For example, your consultancy company is the controller when you decide how and why you collect client data.

6. Data Processor

A person or organisation (other than an employee of the controller) that processes personal data on behalf of the controller, for example: cloud software or an outsourced marketing agency.

7. Consent

Freely given, specific, informed and unambiguous indication of the data subject's wishes, by which they, by a clear affirmative action, signify agreement to the processing of personal data.

8. Supervisory Authority

The UK's independent regulator for data protection is the **Information Commissioner's Office (ICO)**.

9. Data Breach

A breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

10. Profiling

Automated processing of personal data to evaluate certain personal aspects, such as performance at work, economic situation, health, preferences, interests, reliability, behaviour, location, or movements.

11. Third Party

Any other company or person you share data with, who is not the data subject, controller, or processor.

12. Cookies

Small data files placed on your device when you visit a website — often used for tracking, analytics, or personalization.

Roles and responsibilities

1. Data Controller

Who: Therapeutic Thinking Ltd.

Responsibility:

- Determines the purpose and means of processing personal data.
- Ensures processing activities comply with the UK GDPR.
- Maintains a lawful basis for each type of data processing.
- Ensures data subjects can exercise their rights.

2. Data Protection Officer (DPO) (if applicable)

A formal Data Protection Officer is **not required** for this organisation under **Article 37 of the UK GDPR**. However, data protection responsibilities are assigned to:

Adam Hayes

Managing Director

adam@therapeuticthinking.co.uk

This person is responsible for overseeing data protection strategy and compliance within the organisation and serves as a point of contact for any data protection-related queries.

3. Employees / Staff / Contractors

Responsibility:

- Follow data protection policies and procedures.
- Only access, use, or share personal data where authorised.
- Report data breaches or suspected breaches immediately.
- Complete data protection training.

4. Data Processors (Third Parties)

Who: Any external company that processes personal data on the company's behalf (e.g. CRM platforms, email tools).

Responsibility:

- Act only on written instructions from the controller.
- Implement appropriate technical and organisational measures to ensure data security.
- Assist in complying with data subject rights.
- Notify of any data breaches without undue delay.

5. Senior Management / Company Directors

Responsibility:

- Ensure that GDPR compliance is embedded into the business strategy.
- Support a culture of privacy and accountability.
- Approve policies and allocate resources for data protection.

Data protection principles

The GDPR is based on data protection principles that Therapeutic Thinking Ltd. must comply with.

The principles state that personal data must be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed;
- Accurate and, where necessary, kept up to date;
- Kept for no longer than is necessary for the purposes for which it is processed;
- Processed in a way that ensures it is appropriately secure.

This policy sets out how Therapeutic Thinking Ltd. aims to comply with these principles.

Data we collect

We may collect and process the following types of personal data:

- Identification data (e.g., name, job title, company name)
- Contact details (e.g., email address, phone number, postal address)
- Financial information (e.g., payment details, billing address)
- Technical data (e.g., IP addresses, cookies, usage data)
- Information about your training with Therapeutic Thinking Ltd.
- Information you give us in order for us to provide training to you (e.g. dietary requirements)
- Information about your use of the Website (e.g. what you have read and what actions you have taken)
- Confidential or sensitive information necessary for service provision

Sensitive Personal Information

Whilst we do not intend to collect sensitive personal information, this may occur inadvertently and on an infrequent basis (e.g. if you tell us about a dietary requirement which reveals information about a medical condition).

If this occurs, we will have given you clear and explicit information about why we need the information and we shall only use the information for the purposes for which you gave us the information and then permanently delete it from our systems.

Personal Information we collect automatically

When you use the website, we may collect certain information automatically such as:

- IP addresses (the name and internet address your device uses to identify itself to us)
- Your activity in our website including times and dates of visits
- Information on your location
- Other websites you may have visited

We use cookies and similar technologies to enhance user experience. You can manage your cookie preferences via your browser settings.

When you contact us

We may collect personal information from you when you:

- telephone us
- fill in one of our paper forms at a course or event
- complete a form online
- register online
- enter information into your Planning Portal account
- your organisation requests us to provide services e.g. training

Statistics

We may use personal information to produce statistics. We anonymise these statistics so that no individual can be identified from them. We use the statistics to help us improve our services and to plan for new services.

Research

We may also ask members to complete surveys and we use the information that provided for research purposes and in particular to find out how we can improve our services. You do not have to respond to a survey and can request that we stop sending them.

Marketing

We may send information about other services of ours which may be of interest to you. You have a right at any time to stop us from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, please email enquiries@therapeuticthinking.co.uk.

We follow laws and guidelines when sending marketing communications including:

- Sending marketing communications to a work email address where possible
- When communicating with a non-work email address, we will ensure that we do so either under the soft opt in principles or with the user's explicit consent to carry out marketing.
- In all instances to provide users with an ability to opt out of marketing.
- When using third party companies to assist with marketing we ensure data collection and use is done in accordance with data protection laws.

Such marketing activities may include sending promotional and commercial communications regarding services offered by Therapeutic Thinking Ltd. This may include co-marketing or joint sale opportunities, including promotional events, training and webinars.

In some cases, personal data that you provide us is done via group company platforms. This data may be shared and combined with personal data collected throughout your relationship with Therapeutic Thinking Ltd. Where this is done, it will be communicated to you and, where necessary, obtain your consent before doing so.

How we use your data

We process personal data for the following purposes:

- Providing our services and fulfilling contractual obligations (e.g. supply you with training)
- Communicating with clients and stakeholders
- Legal and regulatory compliance
- Marketing and business development (where consent has been obtained)
- Security and fraud prevention
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (e.g. to produce statistics)

In practice, this means any personal information that you give to us may be used to:

- contact you with the information that you requested
- book on a course or online seminar
- manage online accounts for school, academy or other organisation employees
- prevent and detect fraud
- tell you about changes to our services, website or Planning Portal
- help us improve our services, website or Planning Portal
- get your feedback
- administer the website and Planning Portal (such as troubleshooting, data analysis, research)

Sharing your personal information

Business Partners

We may need to share your information with the following third parties:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.
- We do not share information for marketing purposes.

Legal Requirements and Law Enforcement

We may also disclose your personal information to third parties:

- If we sell our business in which case the personal information that we hold will be part of the transferred assets.
- If we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Third Party Privacy Policies

Our website may contain links to websites owned by other organisations. If you follow a link to another website, these websites they will have their own privacy policy. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website or App.

Storing your data

The security of your personal information is really important to us. We use appropriate technical and organisational measures to safeguard personal information. We use encryption technology where appropriate to enhance privacy and help prevent information security breaches. We use industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our systems.

All third parties who provide services to the website, the Planning Portal or in relation to Personal Data are required to sign contract requiring them to have appropriate technical, administrative and physical procedures in place to ensure that your information is protected against loss or misuse.

All information you provide to us is stored on our secure servers or on secure servers operated by a third party.

Retention of information

We only hold your personal information for as long as necessary for the purposes for which we collected your information.

We have a company retention policy which lays down timescales for the retention of information.

Type of information	Description of information	Retention period
Therapeutic Thinking Tutor data	Name, job title, email addresses, school/company	2 years after the last record has been created or updated

	name of Tutors. Details of tutor's training record.	
Other training course delegates	Name, job title, email addresses, school/company name of delegates	2 years after the last record has been created or updated
Planning Portal account owner data	Name and contact details of all customers including emails, addresses and telephone numbers.	2 years after the last record has been created or updated

We have set these timescales in accordance with any applicable legislation and, where none exists, we will keep your information for the duration of your service contract and then for a period of 7 years after which time it will be deleted.

Emails

If you choose to send us information via email, we cannot guarantee the security of this information until it is delivered to us.

Your rights

Access to information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold, please contact at enquiries@therapeuticthinking.co.uk or write to us at the address at the end of this document.

Changing or deleting your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can use the check boxes on the forms we use to collect your information, or you can also request that we change, amend, delete your information or restrict our processing by emailing us at enquiries@therapeuticthinking.co.uk or writing to us at the address at the end of this document.

Right to prevent automated decision making

You have a right to ask us to stop any automated decision making. We do not intentionally carry out such activities, but if you do have any questions or concerns we would be happy to discuss them with you and you can contact us at enquiries@therapeuticthinking.co.uk.

Transferring Personal Information

You have the right to request that your personal data is transferred by us to another organisation (this is called “data portability”). Please contact us at enquiries@therapeuticthinking.co.uk with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure.

If you have been through the complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: www.ico.org.uk

Telephone: 0303 123 1113

Address: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to our Privacy Policy

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information.

Contact Information

For any privacy-related inquiries, please contact:

Therapeutic Thinking Ltd.

Beacon Innovation Centre

Beacon House

Gorleston

NR31 7RA

Email: enquiries@therapeuticthinking.co.uk

Phone: 01493 446550

ICO Registration reference: ZB898225

Appendix - Planning Portal Data Security

The Therapeutic Thinking Planning Portal (“the Portal”) is a secure, web-based platform designed to help schools and services plan and monitor pupil behaviour and support strategies. We are committed to safeguarding the privacy, security, and rights of all users and the children whose data is processed within the system.

This policy outlines how the Portal complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, and describes the measures we take to protect information stored within the system.

1. Our Role Under GDPR

Schools, services and local authorities act as the Data Controllers, determining the purposes and means of processing pupil and staff data.

Therapeutic Thinking Ltd acts as the Data Processor, processing information on behalf of the school in accordance with their instructions and data sharing agreements.

2. Data Processed

The Portal retrieves and stores limited pupil data via a secure connection with each school’s MIS through Wonde, a trusted third-party integration service.

Categories of data processed include:

- Pupil name
- Date of birth
- Pupil gender
- Year group and class information
- SEND code
- Attendance, exclusion and suspension information
- Behaviour plans, analysis records, and staff observations entered by authorised users

3. Lawful Basis for Processing

Processing is carried out under Article 6(1)(e) of the UK GDPR: “Processing is necessary for the performance of a task carried out in the public interest.”

4. Data Access and Retention

Data is accessible only to authorised school or service staff with secure login credentials. Data retention periods are determined by each school as the data controller. When a school’s contract ends, data held in the Portal is securely deleted following confirmation or after 90 days.

5. Data Security Measures

All data is stored on UK-based servers within ISO 27001–certified data centres hosted by DigitalOcean.

All data in transit is encrypted using TLS 1.2+ and data at rest using AES-256 encryption. Role-based access, strong password policies, and MFA are enforced.

6. Sub-Processors

Sub-Processor	Purpose	Location
Wonde Ltd	Secure integration with MIS	United Kingdom
DigitalOcean	Cloud hosting and data storage	United Kingdom

7. Data Subject Rights

Schools or services manage data subject requests, and the Portal supports them in retrieving, correcting, or deleting data upon request.

8. Data Breach Procedures

In the unlikely event of a breach, Therapeutic Thinking Ltd will notify the affected school's Data Controller without undue delay and assist with mitigation and reporting to the ICO.

9. Contact Information

For any privacy-related inquiries, please contact:

Therapeutic Thinking Ltd.

Beacon Innovation Centre
Beacon House
Gorleston
NR31 7RA

Email: enquiries@therapeuticthinking.co.uk

Phone: 01493 446550

ICO Registration reference: ZB898225

10. Policy Review

This policy is reviewed annually or when significant changes occur.

Appendix - Planning Portal Privacy Notice for Parents/Carers

This notice explains how your child's setting uses the Therapeutic Thinking Planning Portal to support pupil wellbeing through planning. The Portal is provided by Therapeutic Thinking Ltd and is used by schools and services across the UK.

1. Purpose

Schools and services use the Portal to analyse and create support plans for pupils in line with their duty of care and educational responsibilities.

2. What Information Is Processed?

- Pupil name
- Date of birth
- Pupil gender
- Year group and class information
- SEND code
- Attendance, exclusion and suspension information
- Behaviour and support plans entered by staff

3. Who Controls the Data?

Your child's school or service is the Data Controller and decides what information is recorded. Therapeutic Thinking Ltd acts as the Data Processor and stores the information securely on behalf of the school.

4. How Is Data Protected?

All data is hosted on secure UK-based servers (via DigitalOcean) and encrypted in transit and at rest. Access is restricted to authorised staff only.

5. How Long Is Data Kept?

Your child's school or service determines how long records are kept. Data is deleted from the Portal when no longer needed or when the school or service ends its use of the system.

6. Your Rights

You can ask your school or service for access to information held about your child, request corrections, or ask for deletion where appropriate. For more details, contact your school directly.