

Privacy Policy

Noreen Tehrani Associates Psychological Screening



Noreen Tehrani Associates Psychological Screening Ltd. (NTAPS) are committed to protect and respect your privacy.

NTA Psychological Screening Ltd (registration number: 09869450) of 1 Union Court, Richmond, England, TW9 1AA is registered with the ICO (registration number: ZA169767). NTAPS can be contacted on support@noreentehrani.com. Our website is www.noreentehrani.com. This privacy policy was updated on **01 October 2021**. We may change this Privacy Policy & Notice at any time by updating this document. Please review this document frequently.

NTA Psychological Screening provides psychological screening questionnaires and associated psychological services. By completing one of our questionnaires or engaging with one of our services, you agree to our Privacy Policy. Specifically, you expressly consent to us processing your personal data as described in this Privacy Policy & Notice. This Privacy Policy & Notice does not provide any additional terms and conditions nor warranties whether expressly or implied. This Privacy Policy & Notice provides transparency to our users as how their data is collected and used and serves as a privacy notice as required by legislation.

NTAPS Screening:

We issue an invitation to you to complete a psychological screening questionnaire on the instruction of the Data Controller. The Data Controller, usually your employer, will be indicated on the screening invite. We will not contact you other than in performance of the Data Controller's written instructions or to respond to a query from you.

The Data Controller's instruction will include information about you to help us administer the screening such as your name, contact email address, your team (where appropriate) and purpose of the screening.

The screening questionnaire will collect health data about you. Tracking data will also be collected as you complete the questionnaire, such as opening the invitation email, logging into the questionnaire, times when the questionnaire was started and completed and the IP address of the device on which the questionnaire was completed.

When you complete the screening questions, we store those question responses for the Data Controller. If you would like your questionnaire responses erased, rectified, accessed or for any other queries about your responses, please contact your Data Controller directly. If you contact NTAPS, we can forward your request to your data controller for you.

NTAPS Assessments:

Structured interviews or psychological assessments are conducted with your consent. Screening results and assessment reports will be held on your Confidential Medical File. Where your employer has an Occupational Health Department, this data will be held by them. You can request access to all screening and other reports written about you from your employer (Occupational Health). Any management guidance produced by the assessment will be agreed with you before it is sent to your manager/supervisor by Occupational Health.

NTAPS Trauma Therapy:

Trauma therapy is commenced with your consent. Screening results, assessments and management reports related to your trauma therapy will be held on your Confidential Medical File. Where your employer has an Occupational Health Department, this data will be held by them. You can request access to all screening and other reports written about you from your employer (Occupational Health). Any management guidance produced to support your recovery/return to work will be agreed with you before it is sent to your manager/supervisor by Occupational Health.

You will be asked to complete questionnaires and provide feedback on the trauma therapy at the end of the sessions. Feedback and questionnaire results will be used to evaluate the programme and the interventions. The purpose of any research or evaluations undertaken on your data will be used to improve the trauma support programme and the treatment of victims of trauma.

NTAPS' Use of the information:

We use your questionnaire responses to carry out the instruction of the Data Controller. Based on the questionnaire responses we will produce a psychological screening report. Where the Data Controller (e.g. your employer) has an Occupational Health service provider, we will issue the report to them.

Data from the screening questionnaire may also be shared with a NTAPS Psychologist or Trauma Therapist to carry out further assessment or therapy as instructed by the Data Controller. Please refer to your Data Controller if you have any questions regarding their data privacy and data handling policies.

Questionnaire responses may be aggregated anonymously to provide management information to the Data Controller and to perform statistical research to improve our services. Anonymised management information on the effectiveness of the trauma therapy programme will be provided to your employer/data controller. You can withdraw your data from any research (but not from the surveillance) without affecting your right to the trauma therapy.

Data Subject Rights:

Certain regulations afford UK Data Subjects with rights. These rights are listed below. In order to assert any of these rights please contact your Data Controller. Any Data Subject Requests that NTAPS receive will be forwarded to the Data Controller. More information can be found on the ICO website.

Under data protection law, you have rights including:

- **Right of access** - You have the right to ask us for copies of your personal information.
- **Right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at support@noreentehrani.com if you wish to make a request.

Data Retention:

The Data Controller retains control of the questionnaire data. Please refer to your data controller regarding their policies on retention of data.

Data Security:

NTAPS employs generally accepted standards and best practice standards of security for information both during transmission and once we receive it. NTAPS has security measures to ensure that we are UK data privacy legislation compliant with the data we process.

NTAPS data security is designed to protect your personally identifiable information and your data from loss, misuse or unauthorized access, disclosure, alteration or destruction. Our technical and organisational security measures mean that we comply with our obligations to ensure that data stored with us is stored safely and securely.

Our security measures include

- Restricted access controls
- Firewalls
- Online Security (TLS encryption)
- Encryption in transit and at rest

If you have any questions, please contact support@noreentehrani.com for further details.

Sharing and Disclosure of your data:

We use sub-processors to collect and store your data safely and securely. All survey data is stored in the EEA. All our sub-processors have robust security features to ensure that they have the appropriate technical and organisational measures to keep personal data secure and backed up. If you have a query regarding our sub-processors, please contact: support@noreentehrani.com

Though we make every effort to preserve user privacy, we may need to disclose personal information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order or legal process served.

How to complain:

If you have any concerns about our use of your personal information, you can make a complaint to us at support@noreentehrani.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

General definitions:

Data Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Personal data: any information relating to an identified or identifiable natural person (“Data Subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data subject: any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

Processor: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient: a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Third Party: a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Restriction of processing: the marking of stored personal data with the aim of limiting its processing in the future.

Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling: any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Consent: Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Legal Basis:

In addition to the legal basis mentioned above, we may also possess the following legal basis for processing the Data Subject's personal data where:

- the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which the controller is subject;
- processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; or,
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Transfer of Rights:

You may not transfer any of your rights under this Privacy Policy & Notice to any other person. We may transfer our rights under this privacy notice where we reasonably believe your rights will not be affected.

Invalid provisions:

If any court or competent authority finds that any provision of this Privacy Policy & Notice (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this Privacy Policy & Notice will not be affected.

Law & jurisdiction:

This Privacy Policy & Notice is governed by and interpreted according to the law of England and Wales. All disputes arising out of this Privacy Policy & Notice will be subject to the exclusive jurisdiction of the English and Welsh courts.