



**PRIVACY POLICY**

This policy sets out:

- (A) The information we collect about you when you visit our website, use our products or services, or otherwise interact with us;
- (B) How we use, share, store, and secure the information; and
- (C) How you may access and control the information.

In this policy, “**Embrace Counselling HK**” or “**we**” refers to **Embrace Counselling HK** of 1601-1602, Car Po Commercial Building, (together with our subsidiaries, our holding company, and subsidiaries of our holding company from time to time) and “**Platform**” means our website at [www.embracecounsellinghk.com](http://www.embracecounsellinghk.com).

In this policy, “**personal information**” refers to any data, information, or combination of data and information that is provided by you to us, or through your use of our products or services, that relates to an identifiable individual.

**1 - What information we collect about you**

1.1 We collect the following types of information about you:

- (a) Account and profile information that you provide when you register for an account or sign up for our products or services, for example Email Address, Name, Location given (collectively, “**Account Data**”);
- (b) Information you provide through support channels, for example when you report a problem to us or interact with our support team, including any contact information, documentation, or screenshots (collectively, “**Support Data**”);
- (c) Communication, marketing, and other preferences that you provide us when you participate in a survey or a questionnaire that we send you (collectively, “**Preference Data**”);
- (d) Information about your device or connection, for example Location of log in, time Zone setting, browser type. Google analytic data. and information we collect through cookies and other data collection technologies (please read our Cookies Policy for details) (collectively, “**Technical Data**”); and
- (e) Information about your use of or visit to our Platform, for example pages viewed. Whether or not a booking was made. (collectively, “**Usage Data**”).

1.2 We collect the above information when you provide it to us or when you use or visit our Platform. We may also receive information about you from other sources, including:

1.3 How We Store information

Processing purpose	Type of data processed	Legal basis
To book a session.	User Content	To perform our contract with you
To provide updates and reports.	User content	To perform our contract with you
To collect payments	Financial data	Legitimate interest to collect payments owed to us.

- (a) Online US servers host our website.
- (b) QuickBooks accounting system, name and address.

1.4 Protecting the security and integrity of personal information stored:



- (a) Password requirements – eg. minimum 8 characters long, alphanumerical and special icon
- (b) Password protection

#### 1.5 Data Retention Policy

- (a) We will only retain personal information for so long as it is reasonably necessary to fulfil the purposes we collected it for.
- (b) Our policy is to hold information for 10 years.
- (c) After such time, we will delete or anonymise your information, or if this is not possible, we will securely store your information and isolate it from further use.

#### **2.0 - Sharing your information**

- (a) We do not share your information with 3<sup>rd</sup> party service providers.
- (b) We do not transfer your information out of the country

2.1 Opting out – you may opt out from receiving our emails and marketing at any time.

- (a) By using the unsubscribe link in our communications, by updating your preferences within your account on our Platform, or by contacting us

2.2 The minimum age of individuals we collect personal data from is sixteen (16) years old.

#### **3.0 - Use of cookies. In addition to strictly necessary cookies we use the following cookies.**

- (a) Analytical / performance cookies - *allow us to recognise and count the number of visitors, and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example by ensuring that users find what they are looking for easily.*
- (b) Functionality Cookies - *are used to recognise the user when the user returns to your website.*
- (c) Targeting cookies - *are cookies that record the user's visit to your website, the pages the user has visited, and the links the user has followed.*

4.0 This privacy Policy was last update June 4<sup>th</sup> 2018.