Privacy Policy: The SEJ & Associated Websites

Last Updated: November 2026

1. Who We Are (Data Controller)

This Privacy Policy explains how **Jacqueline Mary Phillips trading as The SEJ** ("The SEJ", "we", "us", or "our") collects, uses, stores, and protects your personal data across our websites, including www.thesej.co.uk and **The SEJ Wellbeing Centre www.thesej-centre.co.uk** , **SEJ For Business ("Small Businesses Matter")**, and any other associated websites or online portals operated by us (collectively, our **"Websites"**). [1]

For the purposes of the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018, Jacqueline Mary Phillips trading as The SEJ is the **Data Controller**.

- **Business Address:** The SEJ Wellbeing Centre, Unit 2 Leasowes Business Park, Shrewsbury, SY5 6AF
- **Email:** enquiries@thesej.co.uk
- **Telephone:** 07810026415

---

2. What Personal Data We Collect

Depending on how you interact with our Websites and services, we may collect and process the following categories of personal data:

- **Identity & Contact Data:** Your first name, last name, business name, job title, email address, telephone number, and billing/delivery address (for shop/book orders, event bookings, or free consultations).
- **Account & Membership Data:** Login credentials, subscription plan tier, employee headcount tier, and account activity when you register for a member account or **SEJ For Business** plan.
- **Authorised Employee Data (B2B Memberships):** Where a business Client registers employees for access to the SEJ For Business members area, we process the names and work email addresses provided by the employer.
- **Financial & Transaction Data:** Details of payments, invoices, purchases, and subscriptions. For online card or digital wallet payments, transactions are processed securely by our third-party payment processors (such as Wix Payments, Stripe, or PayPal) and we do not store full card numbers. Where you pay via BACS bank transfer or a direct bank payment link, our business banking provider processes your payment reference, account name, and transaction details so we can reconcile your payment and maintain accounting records.

- **Event & Consultation Enquiry Data:** Information you provide when booking workshops, live training events, retreats, a FREE Wellbeing Consultation or any other service or event.
- **Special Category / Sensitive Data (Only Where Voluntarily Provided):** We do not routinely collect medical records. However, if you voluntarily share personal wellbeing context during an enquiry, consultation request, or apply for reduced-fee services under our **"Stay Mentally Healthy" (SMH)** initiative (such as confirming low family income eligibility), we treat that information with strict confidentiality and only process it with your explicit consent.
- **Marketing & Communications Data:** Your preferences in receiving our email newsletter and exclusive updates. [1]
- **Technical & Usage Data:** IP address, browser type, device information, time zone, pages visited, and cookie data collected automatically when you browse our Websites.

---

3. How We Collect Your Data

We collect data when you:

- Browse our Websites (via cookies and analytics tools).
- Create a member account or purchase a SEJ For Business or any other membership plan.
- Purchase books, products, or event tickets through our online Shop or Events pages.
- Book a FREE Wellbeing Consultation or any other service or event or submit a contact form.
- Subscribe to our mailing list.
- Are added as an authorised employee by your employer under an active SEJ For Business membership. [1, 2, 3]

---

4. How & Why We Use Your Data (Lawful Bases)

Under UK GDPR, we only use your personal data when the law allows us to. Our lawful bases include:

Purpose of Processing	Lawful Basis under UK GDPR

Setting up and managing your membership, members area access, and user account	**Performance of a Contract**
Processing orders for books, shop items, paid, donation-based and free services, workshops, and live training events	**Performance of a Contract**
Providing B2B members and other memberships plans area access to authorised employees of a business Client	**Legitimate Interests** (fulfilling our B2B service agreement with your employer)
Responding to enquiries, booking FREE Wellbeing Consultations, paid, donation-based and free services, workshops, and live training events and customer support	**Legitimate Interests** or **Steps Prior to a Contract**
Processing "Stay Mentally Healthy" (SMH) reduced-fee applications	**Explicit Consent**
Sending our email newsletter and updates about events, courses, and wellbeing resources	**Consent** (when you tick our mailing list box) or **Legitimate Interests** (existing B2B clients)
Maintaining website security, preventing fraud, and analysing website traffic	**Legitimate Interests**
Keeping financial, tax, and accounting records	**Legal Obligation**

---

5. Independent SEJ Practitioners & Third-Party Sharing

We never sell your personal data. We only share it where necessary with trusted parties:

- **Independent SEJ Consultants & Practitioners:** 1-to-1 sessions and certain listed services are delivered by independent, self-employed SEJ Practitioners. If you book or enquire about a 1-to-1 session with an independent practitioner, we will share your relevant contact details with that practitioner so they can arrange your session. Each independent practitioner acts as their own separate Data Controller under their own privacy policy.
- **Safeguarding & Statutory Authorities:** Where we have a safeguarding concern involving a child, young person, or vulnerable adult at risk of significant harm, we may share relevant personal information with Local Authority Children's or Adult

Social Care Services, the Police, emergency services, or designated safeguarding leads in accordance with UK safeguarding law (see Section 6).

- **Website Hosting & Platform Providers:** Our Websites are hosted and powered by **Wix.com Ltd**, which processes data securely on our behalf to run our site, members area, forms, and bookings.
- **Payment Processors:** Secure payment gateways (such as Wix Payments, Stripe, or PayPal) to process transactions and prevent fraud.
- **Payment & Banking Providers:** Secure payment gateways (such as Wix Payments, Stripe, or PayPal) and our UK business banking provider (where you pay via BACS bank transfer or a bank or direct bank payment link) to process transactions, issue refunds where applicable, and prevent fraud.
- **Email & Video Conferencing Providers:** Email marketing tools (to send newsletters you subscribed to) and video conferencing platforms (such as Zoom and Microsoft Teams) used to host live online workshops and training events.
- **Professional & Legal Authorities:** Accountants, insurers, legal advisors, or HMRC where required by law. [1]

---

6. Children, Young People & Safeguarding Disclosures

6.1 Services for Young People: Where our workshops, events, or wellbeing services are accessed by children or young people under the age of 18, we collect only the personal data necessary to safely deliver the service. For online accounts, mailing lists, or digital services, individuals aged 13 or over may provide their own consent under UK data protection law; for children under 13, verifiable consent must be provided by a parent or legal guardian.

6.2 Safeguarding & Duty of Care (Overriding Confidentiality): The safety and welfare of children, young people, and vulnerable adults is paramount. While we treat personal information and workshop discussions with strict confidentiality, confidentiality is not absolute where safeguarding concerns arise.

6.3 Sharing Data for Safeguarding Purposes: If a young person (or any participant) discloses information, or we observe signs that suggest a child, young person, or vulnerable adult is suffering, or is at risk of suffering, significant harm, abuse, neglect, or immediate danger to themselves or others, we are legally and ethically required to share relevant personal data with statutory safeguarding authorities. This may include Local Authority Children's or Adult Social Care Services, the Police, emergency services, or designated school/organisation safeguarding leads.

6.4 Lawful Basis & Consent: Under UK GDPR and the Data Protection Act 2018 (specifically the "safeguarding of children and of individuals at risk" condition), we may share necessary safeguarding information without prior consent where seeking consent would place the individual at greater risk or prejudice a safeguarding investigation. Wherever it is safe and appropriate to do so, we will inform the young person and/or their parent or guardian before making a referral.

7. International Data Transfers

Some of our trusted third-party service providers (such as Wix, payment processors, or video conferencing tools) operate globally and may store or process data outside the UK. Whenever your personal data is transferred outside the UK, we ensure it receives an equivalent level of protection through UK-approved safeguards, such as **UK International Data Transfer Agreements (IDTAs)**, Standard Contractual Clauses, or adequacy regulations.

---

8. How Long We Keep Your Data (Data Retention)

We only retain personal data for as long as necessary to fulfil the purposes we collected it for, including satisfying legal, accounting, insurance, and safeguarding requirements:

- **Adult 1-to-1 Client & Consultation Files:** For the duration of your sessions with us, plus 7 years from the date of your final session or consultation (in line with UK professional indemnity insurance and legal limitation requirements).
- **Young People's Client & Consultation Files (Under 18s):** Until the young person reaches their 25th birthday, or for 7 years following their final session, whichever is longer (in accordance with UK legal limitation periods for minors and insurer guidelines).
- **Safeguarding Records:** Where a safeguarding concern, disclosure, or referral has been recorded, relevant records are stored securely with restricted access and retained until at least the individual's 25th birthday (or longer where required by statutory safeguarding guidance or our insurers).
- **Active Members & Customers:** For the duration of your membership or account, plus up to 6 years after your account closes to comply with UK tax, accounting, and legal record-keeping requirements.
- **Enquiries & Consultation Requests:** Up to 12 months after your last contact if you do not proceed to book a session or service.
- **Mailing List Subscribers:** Until you unsubscribe or withdraw your consent (you can click **"Unsubscribe"** at the bottom of any marketing email at any time).

---

9. Cookies & Website Tracking

Our Websites use cookies and similar technologies to ensure our site functions properly (essential cookies), remember your login session, and understand how visitors use our pages (analytics cookies).

- You can manage or withdraw your cookie preferences at any time via the **Cookie Banner / Settings** on our Websites or through your browser settings.

---

9. Data Security

We take appropriate technical and organisational measures to protect your personal data from unauthorised access, loss, or misuse, including SSL encryption across our Websites, password-protected member portals, and restricted administrative access.

---

10. Your Legal Rights under UK GDPR

Under UK data protection law, you have the right to:

- **Access** a copy of the personal data we hold about you (Subject Access Request).
- **Rectify** inaccurate or incomplete personal data.
- **Erase** your personal data ("right to be forgotten") where there is no legal reason for us to keep it.
- **Restrict or Object** to how we process your data (including the right to opt out of marketing at any time).
- **Data Portability** (requesting your data in a structured, machine-readable format).
- **Withdraw Consent** at any time where we rely on consent (such as our newsletter).

To exercise any of these rights, please email **enquiries@thesej.co.uk**. We will respond within one month.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office (ICO), at www.ico.org.uk or by calling 0303 123 1113, though we would always appreciate the chance to resolve any concerns with you directly first.

11. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our services or UK law. The latest version will always be published on our Websites with the updated date at the top.