

**Privacy Policy**

Your privacy is incredibly important to me and I aim for you to be confident that your personal information will be kept safely and securely. The information you provide me will also only be used for the purpose it was given to me. I adhere to the current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended, including the following:

* Why I am able to process your information and what purpose I am processing it for
* Whether you have to provide it to me
* How long I store your information for
* Whether there are other recipients of your personal information
* Whether I intend to transfer it to another country
* Whether I do automated decision making or profiling
* Your data protection rights

I am happy at any point to talk through any questions you may have about my data protection policy and you can contact me on lifechangescounselling@protonmail.com. Whether you are a potential, current or previous client, this invitation to chat further is extended to you.

‘Data Controller’ is the term used by the person/organisation that collects, stores and has responsibility for people’s personal data. In this instance, the data controlled is me. I am registered with the Information Commissioner’s Office (ICO).

**My lawful basis for holding and using your personal information**

The GDPR states that I must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which I am processing your data. I have explained these in more detail below:

* If you have had therapy with me and it has now ended; I will use legitimate interest as my lawful basis for holding and using your personal information.
* If you are currently having therapy or if you are in contact with me to consider therapy; I will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called ‘Special Category Personal Information’. The lawful basis for me processing any special categories of personal information is that it is for provision of health

treatment (in this case, counselling) and necessary for a contract with a health professional (in this case, a contract between me and you).

**How I use your information**

Initial Contact

When you contact me with an enquiry about my counselling services, I will collect information to help me satisfy your enquiry. This will include: full name, date of birth, residential address and contact details. Alternatively, your GP or other health professional may send me your details when making a referral, or a parent or trusted individual may give me your details when making an enquiry on your behalf.

If you decide not to proceed, I will ensure all your personal data is deleted within 90 days of the initial contact date. If you would like me to delete this information sooner, please let me know.

While you are accessing counselling

Please be rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if I believe there to be severe harm to yourself or others, legal reasons or a summons to court. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely in paper form in a locked filing cabinet. If information has been provided electronically, this information will be permanently deleted from electronic devices as soon as documented by pen and paper. I assure you that this information is not shared with any third party.

I do keep written notes of each session, these are factual and limited in information to ensure confidentiality. These are kept in a separate drawer to your identifying personal information within my lockable filing cabinet. These notes do not include any identifiable personal information like your name, date of birth or address. I use client codes, which only I have access to, to ensure these remain separate.

For security reasons I do not retain text messages for more than 30 days. If there is relevant information contained in a text message, I will write this information down and include within your file, in my lockable filing cabinet. Likewise, any email correspondence will be deleted after 30 days if it is not important. If necessary, I will print the email correspondence and add it to your paper file in my lockable filing cabinet.

After counselling has ended

Once counselling has ended your records will be kept for five years from the end of our contract with each other and then securely destroyed. If you are under the age of 18, the five years starts from the date of your 18th Birthday. If you want me to delete your information sooner than this, please let me know.

**Third party recipients of personal data**

I sometimes share personal data with third parties, for example, where I contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

Some of these suppliers include Microsoft Office 365, HMRC, ICO, Zoom, Webhealer.

**Your rights**

I try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstance. You can read more about your rights at: ico.org.uk/your-data-matters.

If I do hold information about you I will:

* -  Give you a description of it and where it came from
* -  Tell you why I am holding it, tell you how long I will store your data and how I made this decision
* -  Tell you who it could be disclosed to
* -  Let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you.

To make a request for any personal information I may hold about you, please put the request in writing. Addressing this to lifechangescounselling@protonmail.com

If you have any complaint about how I handle your personal data, please do not hesitate to get in touch with me by writing or emailing to the contact details given above. I would welcome any suggestions for improving my data protection procedures.

If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to ico.org.uk/make-a-complaint.

**Data Security**

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. To ensure this security I ensure that my electronic devices are adequality protected within anti-virus software, up to date and safe. For all paper records these are kept in a locked filing cabinet, which only I have access to.

**Additional information for website owners and employers**

Visitors to my website

When someone visits my website, I use a third-party service Webhealer to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Webhealer to make, any attempt to find out the identities of those visiting my website.

I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website.

I use Webhealer as the content management system for my website – find out more about Webhealer and their data protection by visiting their website directly – [www.webhealer.net](http://www.webhealer.net)

Like most websites we use cookies to help the site work more efficiently. Find out more information about use of cookies here: [Cookies and similar technologies | ICO](https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/)

No user-specific data is collected by me or any third party. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

Last Updated: 01/11/2022 V.1