

# Privacy Policy

Your privacy is very important to me and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to 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:

- 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 it 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, and
- Your data protection rights.

I am happy to talk through any questions you might have about my data protection policy. Please contact me at [raushiacoles@outlook.com](mailto:raushiacoles@outlook.com)

'Data controller' is the term used to describe the person/organisation that collects and stores and has responsibility for people's personal data. In this instance, the data controller is me. I am registered with the Information Commissioner's Office. (ICO Registered ZB237524)

My Insurance Company is Holistic Service Insurance

HIS Counselling & Psychotherapy

Membership no HIS84687

## **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 below:

If you have made an enquiry via my website I will use consent and legitimate interest as a basis for holding and using your personal information.

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**

[Type here]

When you contact me with an enquiry about my counselling services I will collect information to help me satisfy your enquiry. This will include name, contact details, referral source (if applicable). 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 don't decide to proceed I will work to ensure all your personal data is destroyed.

### **While you are accessing counselling**

Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if you consent, Or if required by law (for example in relation to money laundering or terrorism legislation) or if you disclose a risk of significant harm to yourself or others. I will always try to speak to you about this firstly, unless there are significant safeguarding issues preventing me from doing so.

I will keep a record of your personal details to help the counselling service run smoothly. These details are kept securely and are not shared with any third party. I will keep brief written notes of each session, these are kept as hand-written notes in a secure locked box. Hand-written notes are kept separately from, and do not contain your full name and contact details. If there is relevant information contained in a text/Watsapp message I may add this to your hand-written notes. Likewise, any email correspondence will be deleted if it is not important.

In accordance with my insurer I will destroy hard copies after five years having been archived.

### **Third Party Recipients of personal data**

I use Outlook to send my emails and these are always encrypted with SECURE for data protection purposes if containing sensitive information.

### **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 destroy 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 circumstances. You can read more about your rights at [www.ico.org.uk/your-data-matters](http://www.ico.org.uk/your-data-matters) .

If I do hold information about you I will (unless an exemption applies):

- 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 for 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 report 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 this request in writing.

[Type here]

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 email to the contact details given above. I welcome any suggestions to improve 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 [www.ico.org.uk/make-a-complaint](http://www.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. Handwritten notes will be shredded once the required archiving time has finished.

### **Website**

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

I also encourage you to review Google's policy for safeguarding your data:

<https://support.google.com/analytics/answer/6004245>

Like most websites I use cookies to help the site work more efficiently – find out about the use of cookies on this site: <https://automattic.com/cookies>

I advertise on the BACP listings site & Poole therapies and associates. No user-specific data is collected by me or any third party. If you fill in a form on the website, that data may be temporarily stored on the web host before being sent to me.