
PRIVACY NOTICE

Important information

In my role as your therapist / counsellor, I will hold personal information about you. This privacy notice explains how I look after your personal information. It informs you about your privacy rights and how the law protects you.

It is important that you read this privacy notice so that you are fully aware of how and why I am holding and using your personal information.

Personal information that I obtain

Personal information means any information about an individual from which that person can be identified. I may obtain, use, store and transfer different kinds of personal information about you.

- **Identity and contact information** includes your name, marital status, title, date of birth, gender, address, email address and telephone numbers.
- **Professional contact information** includes details of other medical professionals, such as GP and / or psychiatrist, involved in your care.
- **Therapy / counselling information** includes information used to provide counselling / therapy to you including information provided to me or generated by me in the course of therapy and counselling.
- **Financial and transaction information** includes your bank account details, payment card details, insurance details, invoice amounts and payments.

In the course of your therapy / counselling, I may also obtain **special category** data about you. Special category data includes personal data which reveals racial or ethnic origin, religious or philosophical beliefs, trade union membership, data concerning health and data concerning a person's sex life or sexual orientation.

It is important that the personal information which I hold about you is up to date and accurate. Please inform me of any changes to your personal information during the course of our relationship.

How I obtain personal information

I may obtain personal information about you from a number of sources:

- From you.
- From a GP, psychiatrist or other medical practitioner with whom I may need to communicate for the purposes of your therapy / counselling.
- Publicly available material.

How I use your personal information

I use your personal information for the following purposes:

- For the purposes of your therapy / counselling.
- For the purposes of the proper management of my private practice.
- To arrange payment of my fees and for the purposes of financial accounting with respect to my private therapy / counselling practice.
- For the purpose of meeting my professional, regulatory and legal obligations, including professional supervision.
- For the purposes of regulatory or legal proceedings.
- Where I believe you or others are at risk of harm, for the purposes of safeguarding you or others against such harm.

The basis upon which I use personal information

I will only use and hold your personal information (including special category information) where there is a lawful basis for me to do so. These are where it is necessary:

- For the purpose of my legitimate interests in providing professional therapy / counselling services to you and managing a private therapy / counselling practice, including meeting the associated professional obligations upon me, which do not override your interests and fundamental rights.
- For the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- To comply with a legal obligation.

When I use and hold your special category information, it will be where it is necessary:

- For the purposes of the provision of healthcare and treatment and in light of my professional obligations of confidentiality.
- For the purposes of providing a confidential counselling service.
- For the purposes of safeguarding an individual from harm.
- For the purposes of complying with a professional reporting obligations concerning the breach of codes of conduct and ethics. To establish, exercise or defend legal claims.

I do not rely upon your consent in using or holding your personal information or special category information in the usual course of my private practice.

How long I keep personal information

Generally, I will hold your personal information for a period of seven years after the conclusion of our clinical relationship, unless it is necessary to retain your personal information for longer, for example, because:

- There are safeguarding concerns with respect to you or any other individual.
- There is an ongoing possibility of regulatory or legal proceedings.

- I am subject to an ongoing legal obligation.

Who I share personal information with

I will only share your personal information, where it is necessary for the purposes above, with the following:

- A GP, psychiatrist or other medical practitioner with whom I may need to communicate for the purposes of your therapy / counselling.
- My supervisor for the purposes of meeting my professional requirements for regular supervision.
- Professional service providers, for example lawyers, accountants and IT consultants, for the purposes of the proper management of my practice.
- The relevant professional regulator where it is necessary to report potential breaches of ethical principles or codes of professional conduct.
- Relevant organisations where there are safeguarding concerns with respect to you or any other individual.
- Relevant bodies or organisations where I am legally obliged to do so.

International transfer of personal information

I do not transfer your personal information outside of the European Economic Area.

How I protect personal information

I have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I am required to do so.

I will only share your personal information where it is necessary for the purposes above and I am satisfied that the individual or organisation complies with its obligations to keep your personal information secure. In addition, my supervisor is subject to professional obligations of confidentiality.

The legal rights of individuals whose personal information I process

You have the following rights:

- **Request access to your personal information** (commonly known as a "data subject access request"). You can request a copy of your personal information that I hold and check that I am lawfully processing it.
- **Request correction of the personal information** that I hold about you. This enables you to request for any incomplete or inaccurate data I hold about you corrected.
- **Request erasure of your personal information.** You can ask me to delete or remove personal information where there is no good reason for me continuing to process it. You also have the right to ask me to delete or remove your personal data where you have successfully exercised

your right to object to processing (see below), where I may have processed your information unlawfully or where I am required to erase your personal data to comply with local law.

- **Object to processing of personal information** where I am relying on my legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal information.** You can ask me to suspend the processing of your personal information in the following scenarios: (a) if you want me to establish the information's accuracy; (b) where my use of the data is unlawful but you do not want me to erase it; (c) where you need me to hold the data even if I no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to my use of your information but I need to verify whether I have overriding legitimate interest to use it

These rights are subject to various legal exceptions. If you make any of the requests above, I would explain to you in my response if I have relied upon any of these exceptions.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO). Full details can be found on the ICO's website www.ico.org.uk. However, if you have any concerns, I would be grateful for a chance to deal with these before you approach the ICO.

Changes to this privacy notice

I keep this privacy notice under regular review.