

## General Data Protection Regulation: Privacy Notice

As a counsellor and psychotherapist, I store and process personal data. I am registered with the Information Commissioner's Office (ZA234870). This privacy notice outlines what data I keep, why I keep it, and what I will do with it.

### What information do I store, and why?

**Your name and date of birth:** These are used as an identifier in case I need to speak to your GP or other public services, or if you request a letter or report.

**Your address, email address and phone number:** These are used to enable me to contact you. They may also be used as an identifier if I need to speak to your GP or other public services, or if you request a letter or report.

**Your GP details:** This is kept to enable me to contact your GP if necessary. I will only do this at your request, or under the conditions described in my confidentiality policy.

**Clinical Notes:** I keep notes of sessions in order to practice competently and to comply with my insurance company requirements. This includes details of medication, and relevant health conditions.

The lawful basis I use to store and process this information is **Contract**. This is because I am providing you with a service (as defined in my client agreement), and I need this information to be able to provide you with this service. In addition to this I use **Vital Interests**, in the event that I need to contact a third party (e.g. your GP) in order to protect your life or that of another.

### Will I share your data?

There are occasions when I may need to share your data with other professionals. These are:

- If I am summoned by a court of law.
- If I have a serious reason to believe that there is a serious risk of harm to yourself or another, I would inform your GP, or the appropriate authorities or emergency services.
- If you disclose acts of terrorism or money laundering, I would inform the police.
- I discuss clients with my clinical supervisor, to maintain an ethical practice. This is anonymised. I would aim to discuss my sharing of this information with you first, unless I am unable to do so in an emergency, or for legal reasons.

**Clinical Will:** In the event of my death or serious incapacity, I have appointed another counsellor to act as an executor. They will then have access to your name and contact details, and will contact you regarding ongoing support. This will only apply if you are still in counselling with me at that time.

### How is your data stored?

**Clinical notes and personal data:** I use a clinical note-keeping system called BACPAC, which is GDPR-compliant and web-based (ICO Z5351045). I store your personal data, as well as your clinical notes on here. Paper copies of my client data sheet are shredded as soon as the information has been transferred to this electronic system.

**Paper documents:** I keep paper copies of this signed privacy policy and the signed client agreement in a locked filing cabinet, identified by a client code.

**Phone number:** I also store your mobile number in my password-protected work mobile phone, identified by your client code.

**Email:** If you contact me via email, your email address and correspondence will be stored in my work email account (currently Gmail).

**Website:** Your personal information will be stored by my website if you use the contact form provided. My website has an SSL certificate, ensuring that transferred data cannot be read by third parties. Please see my website privacy policy, available on my website, for further information.

**How long will I keep your data?**

**Clinical notes, personal data, privacy policy and client agreement:** I keep this information for 7 years after counselling ends. This is in line with my insurance company recommendations. After this time this information will be disposed of securely as confidential waste.

**Phone number:** I will delete this from my mobile phone 1 month after counselling ends.

**Email:** Your emails and email address will be deleted from my email account 1 month after counselling ends. If you have sent me information pertinent to our work together, this will be added to your clinical notes and stored for 7 years as above. The emails themselves will be deleted.

**Website:** If you have used the contact form on my website, your personal information will be deleted from my website as soon as I have responded to you.

**What rights do you have?**

Under the General Data Protection Regulation (GDPR), you have the following rights:

- **The right to be informed about the collection and use of your personal data** (this document).
- **The right to see the information I hold about you** (free of charge for the initial request).
- **The right to have rectified any inaccurate or incomplete personal information.**
- **The right to have your personal data erased** (however this is not absolute and only applies in certain circumstances. More information can be found on the ICO website, [www.ico.org.uk](http://www.ico.org.uk)).
- **The right to restrict processing of your data** (again this is not absolute and only applies in certain circumstances. More information can be found on the ICO website, [www.ico.org.uk](http://www.ico.org.uk)).
- **The right to data portability** (as I store your information electronically, I must provide data you request in a structured, commonly used and machine readable form).
- **The right to object to my processing of your information.** As the main lawful basis I use is Contract, I cannot provide a service without this information. You therefore have the option to either not become a client, or to find another counsellor.

If you would like to exercise any of your rights at any time you may do so verbally or in writing. I will respond to you in writing within 30 days. My contact details are overleaf.

If you are not happy with the way I use your data, you have the right to complain to the ICO at [www.ico.org.uk](http://www.ico.org.uk) or on 0303 123 1113.

This document is signed by both counselor and client to confirm our agreement

Client..... Date.....

Counsellor..... Date.....