

PRIVACY POLICY

Introduction

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
- Your data protection rights.

I am happy to chat through any questions you might have about my data protection policy, and you can contact me via email on moira@willowcounselling.uk

‘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:00310268012

My postal address is: St. Peter’s House, Gravel Walk. 1 Bishops Road, Peterborough.PE1 1YE. My phone number is: 07538 737811 and my email address is: moira@willowcounselling.uk

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 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 your name, telephone number and email address. 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 2 years. If you would like me to delete this information sooner, just let me know.

While you are accessing counselling.

Rest assured that everything you discuss with me is confidential.

That confidentiality will only be broken if I feel that you are in immediate danger of harm, when you leave the room. I will always try to speak to you about this first, if possible, unless there are safeguarding issues that prevent this. However, if you disclose to me that you are involved in terrorism, money laundering or drugs trafficking, I will need to notify the relevant authorities.

I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely on my personal laptop and are not shared with any third party.

I will keep very brief written notes of each session; these are kept in my Counselling Client Notebooks.

For security reasons I do not retain text messages for more than 6 months. If there is relevant information contained in a text message, I will transfer this to my Counselling Client Notebook. Likewise, any email correspondence will be deleted after 6 months if it is not important or we are no longer working together.

After counselling has ended.

Once counselling has ended your records will be kept for 7 years from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

Third party recipients of personal data

None

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 circumstances. 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 it to moira@willowcounselling.uk

If you have any complaint about how I handle your personal data, please do not hesitate to get in touch with me by 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.

I use Advanced Encryption with 256-bit keys for data at rest and Transport Layer Security to store your electronic data and a locked filing cabinet for written information.

Visitors to my website

I use WordPress.org as the content management system for my website. Like most websites we use cookies to help the site work more efficiently. 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.