

Privacy Notice

This Privacy Notice is issued in compliance with the General Data Protection Regulation (Regulation (EU) 2016/679) as incorporated into United Kingdom law by the Data Protection Act 2018 (together, the "Data Protection Legislation"). For the purposes of the Data Protection Legislation, I act as the Data Controller in relation to the processing of your personal data. I am registered as a Data Controller with the Information Commissioner's Office under registration number **ZB382912**.

2.3 Data Processing and Protection

2.3.1 The Counsellor is committed to the protection of personal data and shall collect, process, and retain only such personal data as is necessary for the provision of counselling services under this Agreement. All personal data shall be processed in a fair, transparent, and lawful manner, stored securely, and retained only for as long as necessary for the purposes for which it was collected, after which it shall be securely destroyed or anonymised.

2.3.2 The Counsellor has implemented appropriate technical, organisational, and procedural measures to protect personal data against unauthorised or unlawful access, use, alteration, disclosure, destruction, or loss.

2.3.3 The lawful basis for processing personal data under this Agreement is the performance of a contract. By entering into this Agreement, the Client consents to the processing of personal data by the Counsellor as necessary for:

- (a) the provision of counselling services; and/or
- (b) assessing whether such services are appropriate in response to the Client's request.

Processing of Special Category Data

The Counsellor may, in the course of providing services, receive personal data that constitutes "special category data" as defined under the Data Protection Legislation. Such data may include, but is not limited to, information concerning the Client's physical or mental health, sexual orientation, religious or political beliefs, and other sensitive personal information.

The Counsellor shall apply heightened safeguards when processing special category data and shall do so only where necessary for the provision of health and/or social care services, which constitutes the lawful basis for processing under the Data Protection Legislation.

The Counsellor shall not sell, share, or disclose personal data to any third party for marketing purposes. Furthermore, the Counsellor does not engage in automated profiling or automated decision-making with respect to the Client's personal data.

3. Collection, Storage, and Sharing of Personal Data

3.1 Information Collected

The Counsellor collects and processes personal data necessary for the provision of counselling services. This may include:

- Contact details of the Client.
- Factual session notes, which may include sensitive information disclosed by the Client.
- Records of creative work, drawings, diagrams, or other materials used during sessions.

3.2 Storage of Personal Data

All session notes for private clients are stored electronically in an encrypted format and backed up on a secure cloud-based system (iDrive). No session notes are maintained in paper format. Other session materials are stored in a manner that does not identify the Client personally. Contact details are stored solely on a mobile device.

3.3 Sharing of Personal Data

Personal data shall not be disclosed to third parties, except in the following circumstances:

- During regular supervision sessions with professional supervisors, who are bound by the same confidentiality obligations as the Counsellor; Clients are identified in these sessions by first name only;
- In the event of the Counsellor's incapacity, a designated MBACP-accredited psychotherapist or counsellor may access only the Client's contact details;
- Where the Client provides explicit consent for disclosure;
- Where disclosure is required under law or is necessary to prevent serious harm to the Client or others, as outlined in the therapy engagement agreement.

3.4 Retention of Personal Data

Personal data will be retained for a period of up to three (3) years following the termination of the therapeutic engagement. This retention period is considered a reasonable balance between preserving potentially useful information for clients who may return to counselling and ensuring personal data is not kept longer than necessary.

3.5 Rights of the Client

Subject to applicable law, the Client has the following rights in relation to their personal data:

- To request access to personal data held by the Counsellor;
- To request correction or completion of inaccurate or incomplete personal data;
- To request the deletion of personal data where it is no longer necessary for the purposes for which it was collected;
- To request that some or all personal data be provided to the Client or a third party in a commonly used, machine-readable format;
- To request the restriction of processing in circumstances where the Client has requested deletion or objected to processing.

The Counsellor may be unable to fulfil certain requests where exemptions under applicable law apply. Clients are invited to contact the Counsellor to exercise their rights or to discuss any aspect of these privacy practices.

Clients Signature.....

Date.....

Print Name.....

Counsellors Signature.....

Date.....

Print Name.....