Privacy Policy

Your privacy is very important to me. You can be assured that any personal information you provide will be kept safe and secure and will be used only for the purpose for which it was provided. I comply with all applicable data protection legislation, including the General Data Protection Regulation (EU/2016/679) (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:

- The lawful basis for processing your personal information and the purpose for which it is used
- Whether you are required to provide this information
- How long your personal information is retained
- Whether your information is shared with other recipients
- Whether your information is transferred to another country
- Whether any automated decision-making or profiling is carried out
- 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 sandra@growthfulcounselling.co.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 and my registration number is: ZC085586

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 and contact details. If you decide not to proceed I will ensure all your personal data is deleted within one month. If you would like me to delete this information sooner, just let me know.

While you are accessing counselling.

You can be assured that all information you share with me will be treated as confidential. That confidentiality will only be broken if there are safeguarding concerns, such as a risk to a child or young person (Children's Act 1989), money laundering (Proceeds of Crime Act, 2002), or human trafficking (Modern Slavery Act, 2015). I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

I will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely on a password protected folder on a password protected laptop and are not shared with any third party. I also will keep brief, factual and objective typed notes of each session, which are kept in a password protected file separately and are not shared with any third party.

For security reasons I do not retain text messages for more than one month. Likewise, any email correspondence will be deleted within one month, unless it contains important information, in which case it will be stored electronically with password protection.

After counselling has ended.

Once counselling has ended your records will be kept for seven 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.

Your rights

I strive to be as transparent as possible in providing individuals 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: https://ico.org.uk/for-the-public/

- Provide a description of the information and explain where it came from
- Explain why I am holding it, how long it will be stored, and the basis for that decision
- Inform you of anyone with whom the information could be shared
- Give you a copy of the information in a clear and understandable format

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: sandra@growthfulcounselling.co.uk

How it might look

Data security

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 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: https://ico.org.uk/make-a-complaint

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 by using a password protected device.

Additional information for website

When someone visits my website, I use a third party service, Wix, to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Wix to make, any attempt to find out the identities of those visiting my website. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website. Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies: https://support.wix.com/en/article/cookies-and-your-wix-site

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.