

# three cairns counselling

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## PRIVACY NOTICE

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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 for what purpose I am processing it
- Whether you have to provide it to me
- How long I store it for
- Whether there are other recipients of your personal information
- Your data protection rights

I am happy to respond to any questions you might have about my data protection policy and you can contact me via email on [valfreeman@threecairns.com](mailto:valfreeman@threecairns.com).

'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 [registration reference: ZA260067]. My phone number is: 07582-160-516. My email address is: [valfreeman@threecairns.com](mailto:valfreeman@threecairns.com).

### **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, date of birth, home address, address from which you'd be video-calling me (if different from home address), phone number, GP details and an emergency contact's name, relationship to you and phone number. 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, including texts and emails, is deleted within three months of your last contact. 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 due to legal and statutory requirements if a) there is a risk of harm to yourself or others, b) there is a risk of harm to any child or vulnerable adult, or c) your data is the subject of a court subpoena or summons. 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 my computer and are not shared with any third party.

I will keep written notes of each session. Electronic notes are kept securely on my computer, while paper notes are locked in a metal box file in a secure location.

### *After counselling has ended*

Once counselling has ended your records will be kept for three years from the end of our contact with each other and then securely destroyed. An exception exists if there are legal considerations why I must retain your records for longer and in that case, I will keep them for as long as is required. If you want me to delete your information sooner than this, you can request this and I will comply unless there are legal considerations that prevent this.

### **Third party recipients of personal data**

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

### **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](https://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 [valfreeman@threecairns.com](mailto:valfreeman@threecairns.com).

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by contacting me on the email address 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](https://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. My phone, computer and counselling notes are password protected, and paper files are anonymised and locked in a metal cabinet in a secure location.

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