



Sabal

COUNSELLING

## Privacy Policy

### 1. 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, and
- 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.

'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 (reg no ZB709787).

### 2. 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 consent initially. I will then retain any counselling records in case of the need to reference them in the future (the official legal basis is to defend against potential legal claims).

### 3. 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 to process your enquiry. This will include your name, email address, and/or telephone number.

Alternatively, your GP or other health professional may send me your details when making a referral, or a 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 48 hours. If you would like me to delete this information sooner, please 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 you or someone else is at risk of serious harm, or the law requires it of me. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this.

I store your personal information and session notes electronically in an encrypted cloud-based drive. Your session notes are pseudonymised and are kept wholly separate from your personal details.

Any email correspondence will be deleted after 1 month if it is not important. If necessary, I will file important correspondence with your personal details.

#### *After counselling has ended*



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C O U N S E L L I N G

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*

I share a limited amount of 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.

#### **4. Your rights**

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 on the ICO website.

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 [jen@sabalcounselling.com](mailto:jen@sabalcounselling.com).

#### **5. Data security**

I take the security of the data I hold about you very seriously. I access your data using my password-protected laptop and smartphone. I am the only person who has access to these devices and have appropriate malware solutions installed. I do not maintain paper records.



## 6. Website visitors

My website uses Google Analytics 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 Google 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, I use cookies to help make my website work and to give you the best possible experience. Cookies are small text files that are saved on your computer, tablet or mobile phone. I use cookies to store information about how you use my website and to remember any preferences you set. I use both necessary cookies and analytics cookies.

Necessary cookies are required to make the website work properly. Analytic cookies collect information about how you use the website, such as what pages you visit, how you got there and what you click on. These cookies do not collect or store any personal information and cannot be used to identify you individually. I use this information to help me to improve the site and ensure that it meets the needs of visitors.

## 7. Queries and complaints

If you have any questions or concerns about the way I have processed your personal information, please get in touch with me at [jen@sabalcounselling.com](mailto:jen@sabalcounselling.com). 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.