

# Privacy Policy

This privacy policy explains how I, Hillary Smith Counsellor/Psychotherapist, trading as Consultancy 22, use any personal information I collect on you when you contact me either via telephone or email and during any contracted counselling sessions.

## What personal data do I collect and why:

*Contact information:* Your name, email address, telephone number

This data is retained for the duration of contracted therapy, or until your initial enquiry is resolved. It is then deleted within 2 weeks, or two weeks after therapy ends. Your email address will be stored in my email account which is password protected. Your telephone number is stored within my calls or text messages log without a contact being created, my phone has a security pin. My lawful basis for processing this data under GDPR is (b) Contract: the processing is necessary for a contract I have with an individual, or because they have asked me to take specific steps before entering into a contract. I use this personal data to maintain contact with you and communicate any changes in our contracted therapy.

*Financial records:* Your name, date of session, amount paid and method of payment

This data is stored in an excel spreadsheet, which is encrypted with a password. It is retained for 7 years in accordance with maintaining financial income records and for insurance purposes in case of a claim, it is then deleted. My lawful basis for processing this data under GDPR is (f) Legitimate Interests: I use this data in ways individuals would reasonably expect for a specific purpose, and which have a minimal privacy impact.

## *Clinical notes in paper format*

This is where I record personal information that is relevant to your treatment and sessions. This can include information regarding your gender, age, employment, relationships, life experience, thoughts and feelings, as well as more sensitive information regarding medication, physical or mental health conditions, sexual orientation, goals for therapy. I also record what therapeutic interventions I use and outcomes. I use a code as a reference to each client to maintain confidentiality, therefore no names are used, to prevent identification. When not in use these notes are stored in a key locked cabinet. These notes are retained for 5 years for insurance purposes in case of a claim. They are then destroyed using confidential waste services. My lawful basis for processing this data under GDPR is (f) Legitimate Interests: I use this data in ways individuals would reasonably expect and which have a minimal privacy impact as I anonymise my records. Personal information held in my clinical notes helps me to conduct a risk assessment of each client, as well as to plan and review the therapy which is of direct benefit to the client. The information I record will be relevant to why the client is attending counselling and to my choice of therapeutic intervention.

## Sharing your personal data:

I do not use any of your personal data for marketing purposes, and will not share or sell your personal information to third parties. The exception to this is if you have requested me to do so, or I am required to fulfil a legal duty by a court order. For safeguarding yourself or someone else I may have to share your personal data with another healthcare professional. Where statutory law requires me to inform the relevant authorities regarding terrorist activities, drug or people trafficking or abuse of a child or vulnerable adult. In these circumstances I will inform you of what information has been shared, when and to whom.

## Your rights:

Under GDPR you have individual rights:

1. *Right to be informed*, individuals have the right to be informed about the collection and use of their personal data.
2. *Right of access*, individuals have the right to access their personal data and supplementary information.
3. *Right of rectification*, individuals to have inaccurate personal data rectified, or completed if it is incomplete.
4. *Right to erasure*, individuals have a right to have personal data erased, the right is not absolute and only applies in certain circumstances.
5. *Right to restrict processing*, individuals have the right to request the restriction or suppression of their personal data, the right is not absolute and only applies in certain circumstances.
6. *Right to data portability*, allows individuals to obtain and reuse their personal data for their own purposes across different services.
7. *Right to object*, Individuals have the right to object to: processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); direct marketing (including profiling); and processing for purposes of scientific/historical research and statistics.
8. *Rights related to automated decision making including profiling*, there are GDPR provisions for automated individual decision-making: making a decision solely by automated means without any human involvement. Profiling: automated processing of personal data to evaluate certain things about an individual.

#### Access to your information and correction:

You have the right to request a copy of the information that I hold about you. If you would like a copy of any or all of your personal information, please put your request in writing to using the contact details below. I want to ensure your personal information is accurate, therefore you may ask me to correct information you think is inaccurate.

#### My website:

Hjsmithcounselling.com does not use cookies to track or record how the website is being used; does not use Google Universal Analytics to collect information on visitor numbers, or where visitors have come to the website from.

#### Other websites:

My website contains links to other websites. This privacy policy only applies to my website [hjsmithcounselling.com](https://hjsmithcounselling.com) and so when you link to other websites you should read their own privacy policies.

#### Complaints:

If you have any concerns over how I have handled your personal data you can complain to the Information Commissioners Office ICO where I am registered as a data controller.

ICO Helpline 0303 123 1113 or website <https://ico.org.uk/concerns/handling>

#### How to contact me:

For any queries or requests you can contact me by telephone 07980 957698. By email [hjsmithcounselling@gmail.com](mailto:hjsmithcounselling@gmail.com) or write to me at Hillary Smith, Consultancy 22, Hideaway Work Space, 1 Empire Mews, London, SW16 2BF.

This privacy policy was updated on 25 May 2018.