



## Privacy Policy

### Introduction

Your privacy is very important to me, and I am committed to keeping your personal information safe and secure. It will only be used for the purpose for which it was provided. I comply with all relevant data protection laws, 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 outlines how I handle your personal information, from initial contact to after your therapy has ended. If you have any questions, please feel free to contact me here.

### Data Controller

As the 'Data Controller', I, Sophie Wilson, am responsible for collecting, storing, and managing your personal data. I am registered with the Information Commissioner's Office (ICO) under registration number ZB530963.

### Lawful Basis for Processing Your Data

Under GDPR, I must have a lawful basis for processing your personal data. The lawful basis depends on our relationship:

- **Legitimate Interest:** If your therapy with me has ended, I rely on legitimate interest as the basis for retaining and using your personal information.
- **Contract:** If you are currently receiving therapy or inquiring about therapy, I process your personal data based on the necessity of our contract.

### What Data Do I Collect and Why?

I collect, store, and process personal information to operate my counselling practice and provide the services you request. This data may include:

- Contact information
- Age, health (mental and physical), and sexuality (if relevant to therapy)
- Domestic and financial arrangements (if relevant)
- Other special category data

This data is collected under the lawful basis of "Contract" as required by GDPR. It is gathered when you contact me directly or via a referral from a health professional.

## Will I Share Your Data?

All conversations and information shared with me are confidential. I will not sell, share, or use your data for unethical purposes. However, I may share your data in the following situations:

- **Legal Obligations:** If required by law (e.g., Acts of Terrorism, human/drug trafficking, money laundering) or by court order.
- **Safeguarding:** If you or someone you mention is at risk of harm, I may need to inform my supervisor, your GP, or the police. I will always discuss this with you beforehand, unless safeguarding issues prevent it.

## How Will I Store Your Data?

Your identifiable data is securely stored in a password-protected file. Session notes are handwritten and stored as a hard copy in accordance with GDPR in a secure filing system. Here's how I handle different types of data:

- **Phone numbers:** Stored in a passcode-protected business mobile phone.
- **Emails:** Stored in a password-protected account through Roundcube WebMail and deleted after 24 hours if not important. Necessary information will be added to your session notes.
- **Website Contact Form:** Information submitted through my contact form is kept in a password-protected folder on my WebHealer-powered website. I do not share your data with WebHealer, though I use Google Analytics to monitor website traffic without identifying personal data.

## Online Counselling

If we agree to online counselling, this will be conducted via Zoom. I recommend reviewing Zoom's data privacy and usage policies to ensure you agree with their terms.

## Your Rights

You have several rights regarding your personal information, including:

- The right to request deletion of your data
- The right to limit the processing of your data
- The right to request a copy of your data
- The right to correct any inaccuracies in your data

For more information, please visit the ICO website. If you would like to make a request for your personal data, please email me at [sophie@sw-counselling.co.uk](mailto:sophie@sw-counselling.co.uk).

## **How Long Will I Store Your Data?**

Session records and any documents containing your personal data will be kept for 5 years, in line with my insurance provider's requirements. After 5 years, all data will be securely disposed of. Phone numbers and emails will be deleted around one month after our work finishes, unless you request earlier deletion.

## **Complaints**

If you have any concerns about how I handle your data, feel free to contact me. If you wish to make a formal complaint, you can contact the [Information Commissioner's Office \(ICO\)](#) or call them on 0303 123 1113.

## **Consent**

If you do not consent to me using your data as described in this privacy policy, it is unlikely I will be able to work with you. Please indicate your consent by signing below:

---

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_