



## Privacy Notice

### 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,
- How long I store it for,
- Whether there are other recipients of your personal information,
- Your data protection rights,
- How to complain.

I am happy to chat through any questions you might have about my data protection policy – 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 – Anna Pecka. I am registered with the Information Commissioner’s Office (CSN9962521).

My email address is: [nuanced.mind@outlook.com](mailto:nuanced.mind@outlook.com)

## **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' (like your mental health and medical history). 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 satisfy your enquiry. This will include your name, contact details (email address and phone number), your availability and nature of problem you would like to work through.

If you decide not to proceed, I will ensure all your personal data is deleted within 1 year. 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 if: 1) there is serious concern about your safety or the safety of others; 2) there is risk of serious harm to a child or vulnerable adult; 3) disclosure is required by law or

court order; 4) you disclose involvement in or knowledge of an act of terrorism or of money laundering.

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 in the cloud (protected OneDrive folder) and are not shared with any third party.

I will keep written notes of each session; these are kept securely in the cloud (protected OneDrive folder).

For security reasons I do not retain text messages for more than 1 year. If there is relevant information contained in a text message I will move it onto the personal information page of your Therapy Contract. Any email correspondence will be deleted after 1 year and any potentially important information will be transferred to the personal information page of your contract.

#### **After counselling has ended.**

Once counselling has ended your records (personal details & clinical notes) will be kept for 7 years from the end of our contact with each other, after which they will be securely destroyed. If you want me to delete your information sooner than this, please let me know.

#### **4. 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 e.g. online video conferencing and cloud data storage through Microsoft Office 365 services. I ensure that they do not use your information in any way other than the task for which they have been contracted.

#### **5. 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 [www.ico.org.uk/your-data-matters](http://www.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 [nuanced.mind@outlook.com](mailto:nuanced.mind@outlook.com).

If you have any complaint about how I handle your personal data, please do not hesitate to get in touch with me by 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 [www.ico.org.uk/make-a-complaint](http://www.ico.org.uk/make-a-complaint).

## **6. 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. I use encrypted cloud service via protected OneDrive folder.

## **7. Visitors to my website**

When someone visits my website, I use a third-party service, Wix.com, 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.com 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.

You can read Wix.com privacy policy here: <https://www.wix.com/about/privacy>.

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.