



## **Annabel Marshall Counselling and Psychotherapy**

### **Privacy Policy**

Your privacy is very important to Annabel Marshall Counselling and Psychotherapy, 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. I adhere to current data protection legislation, including the General 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 the initial point of contact through to after your therapy/supervision has ended.

I am happy to chat through any questions you might have about my data protection policy, and you can contact me via [annabel@annabelmarshall.co.uk](mailto:annabel@annabelmarshall.co.uk).

'Data controller' is the term used to describe the person/organisation that collects and stores and has responsibility for people's data. In this instance, the data controller is Annabel Marshall.

I am registered with the Information Commissioner's office: registration number -ZB176194.

#### **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. Personal data is your name and contact details. 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/supervision 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/supervision or in contact with me to consider therapy/supervision, 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. Sensitive Personal information are your GP details, date of birth, medical details and history and emergency contact number. 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/psychotherapy) 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/supervision services, I will collect information to satisfy your enquiry. This will include your name and your preferred contact details. Either telephone or email address. Alternatively, a parent or trusted individual may give me your details when making an enquiry on your behalf.

If you do not proceed, I will ensure all your personal data is deleted as soon as I have responded to your enquiry.

**While you are accessing counselling/supervision.**

Everything you discuss with me is confidential. That confidentiality will only be broken if you disclose the risk of serious harm to yourself or others, or you disclose acts of terrorism, money laundering and issues of public interest to the police. 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 service run smoothly. These details are anonymised using first name and initial kept securely on a password protected laptop or in a locked filing cabinet. If transported, they will be kept in a locked bag and are not shared with any third party.

I will keep brief written notes of each session, these will be kept on a password protected laptop and anonymised using initials only. Each set of notes will be individually password protected.

For security reasons I delete text messages as soon as I have dealt with them. If there is relevant information contained in the text message, I will make a copy and store this in a paper file in a locked filing cabinet. Please note text messages are not my preferred contact method. Likewise, any email correspondence will be deleted after I have responded to or dealt with it, if not important. If necessary, I will make a copy and store in a paper file in a locked filing cabinet.

**After Counselling/supervision has ended.**

Once your counselling/supervision has ended, your records will be kept for seven years from the end of our contact with each other and then securely destroyed.

**Third party recipients of personal data**

I will only share your data with third party recipients in the event of the following:

- You disclose serious risk of harm to yourself or others.
- You disclose information regarding terrorism, money laundering or matters of public interest to the police.
- I am asked by a court of law to share information.
- A third party is paying for the cost of your therapy.

**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 and 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 [annabel@annabelmarshall.co.uk](mailto:annabel@annabelmarshall.co.uk)

If you have a complaint about how I handle your personal data, please do not hesitate to contact me by emailing me at the contact details given above.

### **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.

- Laptops/tablets are password protected and with up-to-date antivirus protection in place. All notes/forms stored on laptops are password protected.
- All paper documents are stored in a locked filing cabinet and if transported are always in a locked bag and under supervision.
- Any correspondence sent by letter, email, text or phone is deleted when no longer needed. If any copies of the above are needed to be kept, they will be stored in a locked filing cabinet or password protected on an electronic device.

### **Visitors to 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.

I use WordPress as the content management system for my website.

Like most websites I use cookies to help the site work more efficiently.

No user specific data is collected by me or any third party. If you fill a form in on my website, that data will be temporarily stored on the web host before being sent to me.

