

Privacy Policy

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. Please contact me at jaynehumphreycounselling@gmail.com

'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 (Registration ZB278709).

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 made an enquiry via my website I will use consent and legitimate interest as a basis for holding and using your personal information.

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 that it is for provision of health treatment (in this case counselling) and necessary for a contract with a health professional (in this case, a contract between me and you).

How I use your information

When you contact me with an enquiry about my counselling services I will collect information to help me satisfy your enquiry. This will include name, contact details, referral source (if applicable). Alternatively, your GP or other health professional may send me your details when making a referral or a parent or 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 12 months. 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 you consent, if required by law (for example in relation to money laundering or terrorism legislation) or if you disclose a risk of significant harm to yourself or others. 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 on my encrypted, password protected PC and are not shared with any third party. I will keep written notes of each session, these are kept as hand-written notes in a secure drawer. Hand-written notes are kept separately from, and do not contain your full name and contact details. For security reasons I do not retain text messages for more than 7 days. If there is relevant information contained in a text message I will add this to your hand-written notes. Likewise, any email correspondence will be deleted after 14 days if it is not important.

Once counselling has ended I will digitise and secure hand-written records, and destroy hard copies securely. I may choose to switch to digitised notes before the end of your counselling if I decide that this provides a more secure way of keeping your data. Electronic copies will be kept for 7 years from the end of our contact with each other and are then securely destroyed. Once records have been digitised I will continue to keep name and contact details separately from notes. If you want me to delete your information sooner than this, please tell me.

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, such as secure data storage, or online communication providers. 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.

These third parties currently are:

Googlemail (for email)

Microsoft (for secure digital storage)

Google and We Are Kiku (for secure storage of contact details and practice management)

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 .

If I do hold information about you I will (unless an exemption applies):

- 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 jaynehumphreycounselling@gmail.com

If you have any complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the 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

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 two-factor authentication to protect any data that is backed-up using a secure cloud-based service. The PC I use is encrypted and password protected. Handwritten notes are shredded once they have been transferred to my PC.

Website

When someone visits my website, I use third-party services, Webhealer and 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 WebHealer or Google to make, any attempt to find out the identities of those visiting my website. My website is hosted by WebHealer, and data submitted through my website is processed through them.

I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website.

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its advertising network.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

I also encourage you to review Google's policy for safeguarding your data:

<https://support.google.com/analytics/answer/6004245>

Like most websites I use cookies to help the site work more efficiently – find out about the use of cookies on this site: <https://automattic.com/cookies>

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.