

Jayne Humphrey Counselling

Client Privacy Notice

Your privacy is 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 UK General Data Protection Regulation.

This privacy notice tells you what you can expect me to do with your personal information.

- Contact details
- What information I collect, use, and why
- Lawful bases and data protection rights
- Where I get personal information from
- How long I keep information
- Who I share information with
- How to complain

'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).

Contact details

Email: jaynehumphreycounselling@gmail.com

What information I collect, use, and why

I collect or use the following information to provide an effective therapeutic service:

- Name, address, and contact details
- Gender
- Pronoun preferences

- Date of birth
- Next of kin details including any support networks
 - Emergency contact details
 - Health information (including medical conditions, and medication)
 - Information about care needs, including any disabilities or special needs.

I may also collect the following information to provide a therapeutic service.

- Racial or ethnic origin
- Sexual orientation information
- Sex life information

Lawful bases for the collection and use of your data

The GDPR states that I must have a lawful basis for collecting and processing your personal data. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website. There are different lawful bases depending on the stage at which I am processing your data. I have explained these below:

- For an initial enquiry via email or my website, my lawful basis will be consent and legitimate interest.
- During therapy, my lawful basis will be consent, contract and legitimate interest.
- After therapy ends my lawful basis will be legitimate interest.

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 us)

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).

Your rights

Which lawful basis I rely on may affect your data protection rights which are in brief set out below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask me for copies of your personal information. There are some exceptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask me to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask me to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask me to limit how I can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that I transfer the personal information you gave me to another organisation, or to you.
- **Your right to withdraw consent** – When I use consent as my lawful basis you have the right to withdraw your consent at any time. If you make a request, I must respond to you within one month.

Data protection rights request

To make a data protection rights request, please put the request in writing addressing it to jaynehumphreycounselling@gmail.com

If you have any complaint about how I manage your personal data, please get in touch with me by emailing me at jaynehumphreycounselling@gmail.com. I welcome any suggestions for improving my data protection procedures.

If you wish 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

Where I get personal information from

All personal information comes directly from you.

Third party recipients of personal data

Where I have contracted with a supplier to conduct specific tasks, I sometimes share personal data with these third parties, for example, services such as electronic practice management, or online communication providers. In these

cases, I have carefully selected which partners I work with. I 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:

- Gmail (for email)
- Webhealer (for website enquiries)
- Kiku (for electronic practice management)

Data Security

I take the security of your data very seriously, and take the following measures:

- Any initial client assessment notes are destroyed by shredding within 24 hours.
- My data processor for electronic practice management, Kiku, uses RSA 256-bit SSL encryption, which means that your data is encrypted when both processed and stored. Access to Kiku is both password and two-factor authentication protected to ensure that your personal information remains safe and secure. Kiku is fully GDPR compliant.
- My phone, tablet and laptop which are used to access Kiku and/or respond to your emails are fully protected with anti-virus software, are password protected and are only used by me.