

Client Privacy Notice

Your privacy is important and you can be confident that your personal information will be kept securely 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 data from the initial point of contact through to after your therapy has ended including:

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

I am happy to discuss any questions you have about my data protection policy, and you can contact me via email at alena@vireocounsellingandpsychotherapy.

‘Data controller’ is the term used to describe the person 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 (ICO). Registration number ZC171248.

My postal address is:

Vireo Counselling and Psychotherapy
Blake House
66 Bootham
York YO30 7BZ
North Yorkshire

Telephone 07895 515 775
Email alena@vireocounsellingandpsychotherapy.co.uk

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

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 information that I collect supports me to work within my competence and ensure that we can work together safely.

If you have had therapy with me and it is now ended, I will use legitimate interest as my lawful basis for using your personal information.

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' information. The lawful basis for me processing any special categories of personal information is consent initially.

I will retain any counselling records in the case of the need to reference then in the future (the official legal basis is to defend against potential legal claims).

Your Rights

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 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.

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 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:

Vireo Counselling and Psychotherapy
Blake House
66 Bootham
York YO30 7BZ
North Yorkshire

Or by email: alena@vireocounsellingandpsychotherapy.co.uk

If you make a request, I must respond to you without undue delay and in any event within one month.

If you have a complaint about how I handle your personal data, please get in touch with me by writing or emailing to the contact details given above. I would welcome suggestions for improving my data protection measures.

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 ico.org.uk/make-a-complaint.

More detailed information regarding your rights is provided at the end of this document.

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, and contact details including a telephone number and email address. If you decide not to proceed, I will ensure that all your personal data will be deleted within 1 month. If you would like me to delete this information sooner, just let me know.

Whilst you are accessing counselling

I collect the following information to provide and improve services to clients:

- Name and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Date of birth
- Relationship status
- Third party information (such as emergency contact and GP details, or other relevant parties)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use my website, products and services)
- Health information (such as medical records or health conditions)

We also collect or use the following special category information to **provide and improve products and services for clients**. This information is subject to additional protection due to its sensitivity:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses

We also collect or use the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

Your email address or phone number will be used to provide confirmation of your appointment times, if you consent to this.

Once we agree to work together and prior to your initial appointment I will ask for personal details including your address, date of birth, contact information and contact preferences, and details of your emergency contact and GP. I will also ask for information regarding health conditions and medication. I will only collect personal data directly from you.

Everything you discuss with me is confidential. Confidentiality will only be broken if there is a concern about your safety or the safety of someone else, or if I am instructed to do so by a court of law. I will always try to speak to you before breaking confidentiality, unless there is a safeguarding issue that prevents this.

As a member of the British Association of Counsellors and Psychotherapists (BACP), I am required to have regular supervision in which I discuss my client work with a supervisor who is also bound by the same code of ethics regarding confidentiality.

I will keep a record of your personal details to help our work together run smoothly. These details are kept securely and are not shared with any third party.

I will keep brief factual written notes of each session. These are stored electronically and are encrypted, password and two-factor authentication (2FA) protected.

For security reasons, I do not retain text messages for more than 1 week. If there is relevant information contained in a text message, I will make a note in session notes. Email correspondence will be deleted after 1 month if it is not necessary to keep it. If necessary, I will save and attach the email to the session notes.

After counselling has ended

Once counselling has ended your records – session notes, key emails and written correspondence - will be kept for 7 years from the end of our contact with each other and then securely destroyed. If you want me to delete your information sooner than this, please tell me.

Third party recipients of personal data

I sometimes share a limited amount of personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take 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 a way other than the task for which they have been contracted. These include:

- My accountant, to fulfil my legal obligations for tax purposes
- Microsoft Outlook for email communication
- Google Meet for online sessions
- Kiku Practice Management Software for data processing

Data security

I take every effort to ensure that the data I hold about you is kept secure. The devices I use to communicate, conduct sessions and keep session records are password protected, and encrypted where possible. Anti-virus software is also kept up to date.

Visitors to my website

When someone visits my website, I use a third-party service, Go Daddy, 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 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 Go Daddy to make any attempt to find out the identifies 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.

I use Go Daddy to manage web analytics and the content of my website so that I can continually improve my service to you. You can read Go Daddy's global privacy notice [here](#) with supplemental information for Europe [here](#).

My website uses cookie to help the site work more efficiently, and you can opt-out of non-essential cookies.

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

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us by post at:

Vireo Counselling and Psychotherapy
Blake House
66 Bootham
York YO30 7BZ
North Yorkshire

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Additional Information

Data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. 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.

Which lawful basis we rely on may affect your data protection rights which are set out in brief 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 us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.