

# PRIVACY POLICY

## **INTRODUCTION**

Your privacy is very important to us, 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 us. We 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 we will do with your personal information from initial point of contact through to after your therapy has ended, including:

Why we are able to process your information and what purpose we are processing it for

- Whether you have to provide it to us
- How long we store it for
- Whether there are other recipients of your personal information
- Whether we intend to transfer it to another country,
- Whether we do automated decision-making or profiling
- Your data protection rights.

We are happy to chat through any questions you might have about our data protection policy, and you can contact us via email at <a href="mailto:emma@meadowbrookcounselling.co.uk">emma@meadowbrookcounselling.co.uk</a>

'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 Meadowbrook Counselling.

We are registered with the Information Commissioner's Office ZB845188 Meadowbrook Counselling. Our postal address is: First floor, Eastham Hall, 109 Eastham Village Road, Eastham, Wirral CH62 OAF. Our phone number is: 07756767055. Our email address is: <a href="mailto:emma@meadowbrookcounselling.co.uk">emma@meadowbrookcounselling.co.uk</a>



## OUR LAWFUL BASIS FOR HOLDING AND USING YOUR PERSONAL INFORMATION

The GDPR states that we must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which we are processing your data. we have explained these below:

If you have had therapy with us and it has now ended, we will use legitimate interest as our lawful basis for holding and using your personal information.

If you are currently having therapy or if you are in contact with us to consider therapy, we will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that we look after any sensitive personal information that you may disclose to us appropriately. This type of information is called 'special category personal information'. The lawful basis for us 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 Meadowbrook Counselling and you).

# HOW WE USE YOUR INFORMATION

#### INITIAL CONTACT.

When you contact us with an enquiry about our counselling services, we will collect information to help us satisfy your enquiry. This will include name, date of birth, contact number and email address. Alternatively, your GP or other health professional may send us your details when making a referral or a parent or trusted individual may provide your details when making an enquiry on your behalf. If you decide not to proceed, we will ensure all your personal data is deleted within 28 days. If you would like us to delete this information sooner, just let us know. We also ask questions about neurodiversity and adoption during the assessment process.

## WHILE YOU ARE ACCESSING COUNSELLING.

Rest assured that everything you discuss with us is confidential. That confidentiality will only be broken if you disclose information in contravention of the Terrorism Act 2000, Money Laundering Regulations 2017, the Drug Trafficking Act 1994 and the Children Act 1989 or if there is significant risk of harm to yourself of others. We will try to speak to you about this first, unless there are safeguarding issues that prevent this.



We will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely and are not shared with any third party.

We keep brief written notes of each session. These are kept in a locked filing cabinet in the office. For security reasons I do not retain text messages for more than 28 days. If there is relevant information contained in a text message, we will screenshot that information and add it to your notes. Likewise, any email correspondence will be deleted after 28 days if it is not important. If necessary, we will screenshot that information and add it to your notes. Please note that text messages and emails should only be used for scheduling and cancellation purposes.

### AFTER COUNSELLING HAS ENDED

Once counselling has ended your records will be kept for seven years from the end of our contact with each other and then securely destroyed. If you want us to delete your information sooner than this, please let us know.

#### THIRD PARTY RECIPIENTS OF PERSONAL DATA

We sometimes share personal data with third parties, for example, where we have contracted with a supplier to carry out specific tasks. In such cases we have carefully selected which partners we work with. We take great care to ensure that we have a contract with the third party that states what they are allowed to do with the data we share with them. We ensure that they do not use your information in any way other than the task for which they have been contracted.



### YOUR RIGHTS

We try to be as open as we can be in terms of giving people access to their personal information. You have a right to ask us to delete your personal information, to limit how we 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 we 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.

If we do hold information about you we will:

- give you a description of it and where it came from
- tell you why we are holding it, tell you how long we will store your data and how we 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 us at any time to correct any mistakes there may be in the personal information we hold about you. To make a request for any personal information we may hold about you, please put the request in writing addressing it to emma@meadowbrookcounselling.co.uk

If you have any complaint about how we handle your personal data, please do not hesitate to get in touch with us by writing or emailing to the contact details given above. We would welcome any suggestions for improving our data protection procedures. If you want to make a formal complaint about the way we 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.

### **DATA SECURITY**

We take the security of the data we hold about you very seriously and as such we take every effort to make sure it is kept secure. Digital files are stored in a secure encrypted folder on one laptop and paper copies are stored in a locked filing cabinet.



## ADDITIONAL INFORMATION FOR WEBSITE OWNERS AND EMPLOYERS

#### VISITORS TO OUR WEBSITE MEADOWBROOKCOUNSELLING.CO.UK

When someone visits our website, we use a third-party service, GoDaddy to collect standard internet log information and details of visitor behaviour patterns. We 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. We do not make, and do not allow GoDaddy to make, any attempt to find out the identities of those visiting our website. We use legitimate interests as our lawful basis for holding and using your personal information in this way when you visit our website. We use GoDaddy InSight<sup>TM</sup> so that we can continually improve our service to you. You can view GoDaddy InSight<sup>TM</sup> privacy notice here https://www.godaddy.com/en-uk/legal/agreements/privacy-policy

We use GoDaddy Website Builder as the content management system for our website - find out about GoDaddy and data protection https://www.godaddy.com/en-uk/legal/agreements.

Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies. https://www.godaddy.com/en-uk/legal/agreements/cookie-policy No user-specific data is collected by us or any third party. If you fill in a form on our website, that data will be temporarily stored on the web host before being sent to us.