 **Lynda Johnston Counselling Aberdeen**

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**PRIVACY POLICY**

**INTRODUCTION**

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, and you can contact me via lyndajohnstoncounselling@outlook.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 Number ZB571179].

**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 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**

**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, address, email address, telephone number, GP Practice and any medical condition if relevant. 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 5 working days. 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 I am required to act on child protection issues, money laundering and terrorism activities. 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 laptop and are not shared with any third party. I will keep written notes of each session, these are kept in a secure locked cabinet. For security reasons I do not retain text messages for more than 5 working days after reading the message. If there is relevant information contained in a text message I will add these to your record on my secure laptop. Likewise, any email correspondence will be deleted after five working days of reading the email if it is not important. If necessary I will add these to your record on my secure laptop.

**After counselling has ended**

Once counselling has ended your records will be kept for 5 years from the end of our contact with each other and are then securely destroyed. This period of time complies with BACP guidelines and my insurance provider (Holistic Insurance, Member Number HIS99093). If you want me to delete your information sooner than this, please tell me.

**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 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/for-the-public/)

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 its, 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 lyndajohnstoncounselling@outlook.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 [ico.org.uk/make-a-complaint.](https://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 encrypted devices and a locked filing cabinet.

**ADDITIONAL INFORMATION FOR WEBSITE OWNERS AND EMPLOYERS**

Why include this? If you have a website, employ staff or pay for services from suppliers, you’ll also need to consider how you collect and process their data. This information wouldn’t be included in your therapeutic contracts. If you have a website, you’ll need to be clear about what information you’re collecting and any cookies that you’re using, for example, by Google Analytics. You’ll need to say who hosts the site and any other 3rd party services used by the site. For more information visit the ICO website The ICO updated its cookie guidance in July 2019. All nonessential cookies require opt-in consent from the user - see Cookies and similar technologies

Visitors to my website

When someone visits my website, I use a third party service, [insert name of company] 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 [insert name of company] to make, any attempt to find out the identities 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 [insert name of web analytics company] so that I can continually improve my service to you, You can read [insert name of web analytics company] privacy notice here [insert link]. I use [insert name of content management system] as the content management system for our website - find out about [insert name of content management system] and data protection. Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies. [insert link]. 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