

## Emily Duffy Therapy's Privacy Policy

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### **GENERAL DATA PROTECTION REGULATION (GDPR)**

GDPR is a legal framework that sets guidelines for the collection and processing of personal information from individuals. This is increasingly pertinent due to the advancement and prevalence of digital technology. 'Data controller' is the term used to describe the person/organisation that collects, stores, and has responsibility for people's personal data. In this instance, the data controller is me.

### **Our contact details**

Name: Emily Duffy

Phone Number: 07508387585

E-mail: [emilyduffytherapy@gmail.com](mailto:emilyduffytherapy@gmail.com)

You can read more about your rights at [ico.org.uk/your-data-matters](https://ico.org.uk/your-data-matters). This policy will be relevant to you if you are a client / potential client, relating to what data I keep, why I keep it, and how I store it, as well as if you are a website visitor, relating to how my website collects, uses, discloses, and manages the data of its visitors.

### **CLIENTS & POTENTIAL CLIENTS**

The GDPR makes sure that I look after any sensitive personal information that you may disclose to me. 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 psychotherapy) and necessary for a contract with a health professional (in this case, a contract between me and you).

As a counsellor and psychotherapist who adheres to the NCS's ethical framework, confidentiality is of upmost importance to my practice. Furthermore, transparency is a key aspect of therapy and how I work, and I will discuss these aspects from the outset of all therapeutic contracts.

If you contact me but then do not start any sessions, I will remove any data within 14 days of our last contact.

## **The type of personal information we collect**

We currently collect and process the following information:

Your name, your date of birth, your address and contact details, your GP information, contact information from someone you feel comfortable us communicating with under emergencies.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To contact you when confirming appointments with the service and thus for your appointments.
- To get you support if you are at risk of harm to yourself or anyone else.
- In event of a legal obligation such as terrorism.

Your information will only be shared as above in the cases outlined – in emergencies and where possible with your permission.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

**Your consent. You can remove your consent at any time by contacting myself (via the details at the top of this document.)**

**You can ask me at any time to correct any mistakes there may be in the personal information I hold about you** such as your name, email, phone number, emergency contacts, pronouns, etc.

**You also have the right to request that I erase information about you**, which I will do so to the furthest extent possible, allowing that I may need to retain some information about you to ensure that I am compliant with any legal requirements, or for the purposes of public safety or my own internal complaints processes. I keep minimal information about clients to carry out my work. I conduct regular audits of the data I collect and routinely delete emails, email addresses and text messages.

Once counselling has ended your contact records will be kept for three years from the end of our contact with each other and are then securely destroyed. If you want me to delete your contact details sooner than this, please tell me.

## **When your information may be shared?**

Anonymised session notes are kept for supervision and auditing purposes due to my registration with the National Society of Counsellors.

The Information shared in therapy is strictly confidential. The only time I will break confidentiality and share information about you, is if I believe you are at risk of harming yourself or others, and in compliance with the following acts: The Terrorism Act 2000; Drug Trafficking Act 1994, Proceeds of Crime Act 2002 or the Money Laundering Regulations 2007; Road Traffic Act 1991; the Children Act 1989; the Serious Crime Act 2007, and the Female Genital Mutilation Act 2003. I will endeavour to share my concerns with you prior to taking any action.

## **How I store your personal information**

*Email:* Once we have sessions confirmed or an email requires me to send any confidential information I will use email supplied by google mail which can allow me to use 'confidential mode' – meaning the email will expire after 5 years and requires a passcode to read the email.

*Phone:* I store your initials (and not your full name) and your telephone number on a sim card on my mobile phone. This device could be stolen or lost. My phone is locked by password, but no method is 100% secure against unlocking. I do not share your phone number with any third party.

*Video:* There is currently no verified completely secure video conferencing platform. I will send you a new Zoom meeting link and password each week to limit the possibility of interception.

*Anonymised Case Notes:* these will be kept on my laptop and all documents will be password protected, alongside the password needed to access my laptop. If you would like to access a copy of these notes, please make a written request to my details at the top of this document.

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.

## **WEBSITE VISITORS**

Wix is a Data Processor for my site-visitor's data. This means that Wix will only process site visitors' data following my instructions and, on my behalf, as the Data Controller. Wix will not process my site-visitor's data for their own benefit. For more information about Wix's obligations as a data processor for my site-visitor's data, see their [Data Processing Agreement](#).

When someone visits my website, I use Wix.com and Google Analytics as third-party services 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 Wix or Google 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 Wix Analytics and Google Analytics so that I can continually improve my service to you. To opt out of being tracked by Google Analytics across all websites, visit this link: <http://tools.google.com/dlpage/gaoptout>.

Like most websites Wix uses cookies to help the site work more efficiently. You will be given the option to choose which cookies to opt-in or out of when you visit the site. No user-specific data is collected by me or any third party.

## **How to complain**

If you have any concerns about our use of your personal information, you can talk to me on the details at the beginning of this document.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>