ITWR - PRIVACY POLICY

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 talk through any questions you might have about my data protection policy and you can contact me via email: intherapywithradka@gmail.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 [C1374413]. My email address is intherapywithradka@gmail.com, and postal address: 27 Studio House, 17 Waterden Road, E20 3AP. I am trading as **Radka Mosnier / In Therapy with Radka.**

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 address, phone number, email address and GP details. 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 one month. 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 you are a risk to your life or that of another; if safeguarding of children and vulnerable adults is a concern, if you intent to commit a serious crime; under legal requirement or via court order for disclosure; in the event of my death or incapacitation. 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 password-protected Google Drive and are not shared with any third party.

I will keep written notes of each session, these are kept in anonymised individual files on Google Drive, a cloud storage and it is 2-step verification protected. Your data, encrypted in-transit and at-rest, is securely stored in my Google Drive folders. My insurance policy requires me to retain your records for the period of five years after the end of the counselling. For security reasons I do not retain text messages for more than a month. If there is relevant information contained in a text message, I will screenshot it and add it to

your folder. Likewise, any email correspondence will be deleted after one month if it is not important. If necessary, I will screenshot it and add to your folder.

After counselling has ended.

Once counselling has ended your records will be kept for five years from the end of our contact with each other and are then securely destroyed.

THIRD PARTY RECIPIENTS OF PERSONAL DATA

I sometimes share 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 great 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 any way other than the task for which they have been contracted.

YOUR RIGHTS

I try to be as open as I can be in terms of giving people access to their personal information. 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.

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 intherapywithradka@gmail.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.

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.

ADDITIONAL INFORMATION FOR WEBSITE OWNERS AND EMPLOYERS

Visitors to my website

When someone visits my website, I use the following third-party services to collect standard internet log information and details of visitor behaviour patterns: **DreamHost.com**, **Google Analytics** and **Google Search Console**. 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 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 [insert name of web analytics company] so that I can continually improve my service to you, You can read the privacy policy of **DreamHost.com** here and the **Google Analytics'** Privacy notice here. I use the Privacy Policy of Google as the content management system for my website - find out about how they ensure data protection. Like most websites I use cookies to help the site work more efficiently - find out about the use of cookies. 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.