

Privacy Policy (updated September 2023)

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 email or phone.

'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 under registration number ZB295598.

My postal address is: c/o 19 Nassau Street, London, W1W 7AF. My phone number is: 020 4538 8458. My email address is: alexsherleytherapy@gmail.com.

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

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 and usually some basic factual information about why you are looking to engage with counselling/psychotherapy. 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 six months. If you would like me to delete this information sooner, just let me know.

If you decide to proceed after the initial appointment, I will usually also ask you for your date of birth and GP details. This is to ensure that if it becomes necessary to contact your GP, I am able to do so (please see below under confidentiality for instances where this might be necessary).

While you are accessing counselling

Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if a) it is apparent that there is a serious risk of harm to yourself or to others and b) if I am legally required to do so by a court of law. 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 electronically and securely on an encrypted device, and are not shared with any third party.

I will keep written notes of each session. These are kept in a locked filing cabinet or on an encrypted device.

For security reasons email correspondence will be deleted after six months if it is not important. If necessary I will save the details to an encrypted device.

EAP clients

For clients who come to me via an Employee Assistance Programme (EAP) service, (e.g. AXA), I am also required to upload data to the EAP's case management system. This varies depending on the provider, but typically includes CORE form scores for beginning and ending sessions, the nature of the difficulty and basic factual information regarding problems and issues addressed. Please see section on third parties.

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 are then securely destroyed. This is to comply with the requirement to keep special category personal data for a minimum of seven years. If you want me to stop processing your information sooner than this, please tell me. This means that I will keep it securely for the duration of the seven years, but not use it for any other purpose.

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 third party suppliers do not use your information in any way other than the task for which they have been contracted.

For EAP clients, please contact your individual EAP provider for details of their privacy policy.

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 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 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 alexsherleytherapy@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.

Visitors to my website

When someone visits my website, I use a third party service, wix.com, 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.com 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.com so that I can continually improve my service to you. You can read wix.com's privacy notice here: <https://www.wix.com/about/privacy>.

Like most websites, I use cookies to help the site work more efficiently. As the website is hosted by wix.com and you can find out about the use of cookies via their cookies policy: <https://www.wix.com/about/cookie-policy>

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.

Online appointments

Where you have requested a remote/online appointment, I use Zoom and Skype. I am not responsible for the data security policies of online platforms. I do not record calls and do work with clients who require calls to be recorded.

Zoom's privacy policy can be found here: <https://explore.zoom.us/en/privacy/>

Skype's privacy policy can be found here: <https://support.skype.com/en/skype/all/privacy-security/>

Clients who reside in North America

Due to local laws in the USA and Canada relating to telemedicine, regrettably I am unable to work remotely with clients who are permanently or substantially based in these locations.