



## PRIVACY POLICY

### Introduction

Your privacy is very important to me. I take necessary precautions to ensure that your personal information is kept safe and secure, and that it is used only 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 throughout our relationship, and after our sessions together end.

I am the data controller of Emily Hilton Therapy, and I am registered with the Information Commissioner's Office, under registration number ZA552859. I am always happy to chat through any questions you might have about my data protection policy.

### My lawful basis for holding and using your 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

I ensure that the data I record is **adequate, relevant and limited to what is necessary** for the type of service being provided. Your information will be used only for the purposes of carrying out therapy and for contacting you. All information is held securely.

### 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, email address and/or telephone number, depending on how you contact me.

If we decide not to proceed with booking an appointment, I will ensure that all your personal data is deleted within 48 hours. If you would like me to delete this information sooner, just let me know. If we agree to add you to my waiting list, your information will be deleted after the agreed waiting period has passed. Again, please contact me if you would like your information deleted sooner.

## **While you are accessing therapy**

### **Registration form**

Upon booking an initial session together, I will send you a registration form, which requests further information from you in order to carry out therapy. This includes your name; personal pronouns; telephone number; email address; physical address; emergency contact name and telephone number; relevant medical conditions; relevant prescribed medication; brief mental health history; any history around suicide; and how you found Emily Hilton Therapy.

You are not obliged to provide this data. If you have any questions about why it has been requested, I am happy to discuss them with you.

All completed registration forms are stored securely.

### **Note-keeping**

I keep written notes, taken after every therapy session we have together. These notes are stored securely, and are not shared with anyone. Your identity is anonymised within my notes, and neither your first name nor your surname are associated with them.

### **Supervision**

In accordance with recommended practice, I meet regularly with a supervisor. My supervisor is another qualified therapist, with whom I discuss my work. Some client material may be discussed during these meetings, on an anonymous and confidential basis.

### **Confidentiality and Risk Factors**

As set out in my Therapy Contract, everything that is said within our sessions will remain confidential, providing that:

- nothing said indicates there is a risk of serious harm to you, or to anyone around you
- the law does not require me to disclose anything said in our sessions

In the instance that any of these criteria are met, I may need to make a disclosure to a third party. This disclosure may include some of your personal details, as required by the circumstances of the risk. I will always try to speak to you about this first, unless there are safeguarding issues that prevent this, or unless we are unable to discuss the matter before it is necessary to take action to mitigate any risk.

If we decide together that you would like me to hold additional personal information as a result of any risk factors we identify – for example, if you would like to provide me with your GP details - I will only hold the additional data for the agreed purpose; and I will inform you that the information has been deleted after the purpose has been fulfilled.

### **After therapy has ended**

In line with guidance from my insurer, I will securely store your records for up to seven years after our therapy sessions end. They will then be securely destroyed. If you want me to delete your records sooner than this, please tell me.

### **Third party recipients of personal data**

I do not share any personal data with third parties as standard. If an instance were to occur in which this became necessary, I would inform you, and discuss with you whether you would be happy to proceed with sharing any information.

## Your rights

I try to be as open as possible 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](https://ico.org.uk/your-data-matters).

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 and address it to [emilyhiltontherapy@outlook.com](mailto:emilyhiltontherapy@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 email.

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).

## Visitors to my website

When someone visits my website, the website platform ([www.wix.com](https://www.wix.com)) collects standard internet log information and details of visitor behaviour patterns. 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.

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.

**June 2022**