

# Privacy Statement

A guide to how I handle your data, and how I make sure that it is kept safe and secure.

## Introduction

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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 by emailing [enquiries@stephanieaspin.com](mailto:enquiries@stephanieaspin.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 CSN1866615.

# My lawful basis for holding and using your personal information

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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

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### 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 email, and the reason you are considering counselling at this time. 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 24 hours of your request that I delete it. 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 reasonable doubt regarding your safety or the safety of another person. 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 in my office safe and are not shared with any third party.

I will keep written notes of each session, these are kept in a locked filing cabinet in my personal office. These notes are brief and only contain bullet points of the things we discussed, plus anything I need to remember for our next session (e.g. the name of a book that might be helpful).

For security reasons I do not retain text messages for more than 24 hours. If there is relevant information contained in a text message I will keep this in paper copy with my notes. Likewise, any email correspondence will be deleted after one week if it is not important. If necessary I will print the information off and keep it securely with my written notes.

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## After counselling has ended

**After our work together concludes I keep your name and the contact details you provided me with in a secure file which is kept locked in my office safe. I also keep the dates of our meetings and a brief note of the themes we discussed. Any notes I make are anonymous and do not have your name on them. Notes are kept in a lockable filing cabinet in my personal office, in a separate place from contact details**

Once counselling has ended your records will be kept for 7 years from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

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## Third party recipients of personal data

I will not routinely share your data with any third party. I do not share client data with anyone else—unless you ask me to pass on your details (e.g. you would like me to refer you to another professional) or I am required to by law.

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## 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](https://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 [enquiries@stephanieaspin.com](mailto:enquiries@stephanieaspin.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**

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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.

- Personal details and contact details are stored in my office safe
- All notes of sessions are brief, factual and do not have names on them but are identifiable only by serial number
- All notes are kept in a locked filing cabinet in my personal office
- Only I have access to the data I keep and the places where that data is kept

## **Visitors to my website**

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When someone visits my website, I use a third party service, *Wordpress*, 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 *Wordpress* 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.