

## **Privacy Notice**

### **Introduction**

I am fully committed to ensuring that your privacy is protected. I endeavour to abide by the ethical frameworks of the professional organisations to which I belong, including the UK Council for Psychotherapy (UKCP) and the British Association for Counselling and Psychotherapy (BACP).

Your privacy is important to me, and you can be confident that your personal information will be kept safe and secure and that it 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 psychotherapy has ended, including:

1. Why I can process your information and what purpose I am processing it for.
2. Whether you must provide it to me.
3. How long I store it for.
4. Whether there are other recipients of your personal information.
5. Whether I intend to transfer it to another country.
6. Whether I do automated decision-making or profiling, and
7. Your data protection rights.

I am happy to discuss any questions you might have about my data protection policy, and you can contact me by email at [kirstenuttingtherapy@proton.me](mailto:kirstenuttingtherapy@proton.me)

'Data controller' is the term used to describe the person that collects and stores and has responsibility for your personal data. On this occasion, the data controller is me.

I am registered with the Information Commissioner's Office registration number ZB198714

My email address is: [kirstenuttingtherapy@proton.me](mailto:kirstenuttingtherapy@proton.me)

### **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 will explain these below:

If you have had psychotherapy 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 psychotherapy or if you are in contact with me to consider psychotherapy, 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 your 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 the provision of health treatment (in this case psychotherapy) and necessary for a contract with a health professional (on this occasion, a contract between you and me).

## **How I use your information**

### **Initial contact**

When you contact me with an enquiry about my psychotherapy services, I will collect information to help me satisfy your enquiry. This will include your name and contact information, and the reason for contact. Alternatively, your GP or other health professional may send me your details when making a referral or a 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 30 days. If you would like me to delete this information sooner, please let me know.

### **While you are accessing psychotherapy**

Everything you discuss with me is confidential. That confidentiality **will only be broken if you tell me something that suggests your safety, or the safety of others is in danger**. In this case I would discuss my concerns with you and any other professionals that I might need to contact. I would hope to do this, wherever possible, with your agreement.

I obtain information from:

- What you choose to share with me when you first contact me via my website's contact form, or when you phone or email me to make an enquiry.
- What you choose to share with me – information you send me by email and over the phone (text or voice message)
- Sessions we have together in person, face to face, or phone and online (zoom)
- Your health insurance company or healthcare provider, if relevant, and with your consent

I will keep a record of your personal details to help the psychotherapy run effectively. These details are kept securely in a locked filing cabinet, or on a password protected device.

I will keep basic written notes of each session, these are kept securely in a locked filing cabinet.

For security reasons I do not retain text messages for more than one year. If there is relevant information contained in a text message, I will retain a digital copy. Likewise, any email correspondence will be deleted after one year if it is not important. If necessary, I will retain the email.

### **After psychotherapy has ended**

Once psychotherapy has ended your records will be kept for **seven 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.

### **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 such as a private health provider. 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.

I may wish to liaise with other professionals involved in your care to ensure that an optimal care plan is in place for you. This will only be done with your consent.

### **Supervision, Professional Development and Quality Assurance**

It is required by all psychotherapists to attend professional supervision at which I discuss client presentations as part of my continuing professional development. This is required by professional bodies that I am a member of in order to engage in ethical practice. In these situations, any identifying information about the client concerned is not revealed.

Your name and contact details will be shared with my Therapeutic Executor so that in the unlikely event of my sudden death you can be contacted should you still be in psychotherapy with me. My Therapeutic Executor will be another psychotherapist.

### **Disclosures Required or Permitted Under Law**

The information that you provide to me is confidential. In keeping with codes of ethics for psychotherapists, the information shared within the context of a psychotherapy relationship is treated in a strictly confidential manner and will not be divulged to others without your consent, except in the following exceptional circumstances:

There are some situations where confidentiality may have to be broken or I would be required to share your information with third parties, without your consent:

- Court Order: If I am required to disclose data about you, under a Court Order for me to do so.
- Child Protection: If I am concerned about the welfare of a child, i.e., where there are child protection issues relating to potential physical, mental, sexual abuse or serious neglect
- Risk to self or others: Where there is an imminent risk of serious harm to yourself or harm or exploitation of others.

If you are seeking help and you are perpetrating a serious crime against someone, or you are actively suicidal, I am unable to protect your right to privacy, as I must take appropriate action to protect the rights of children and vulnerable adults if I believe they are at risk. In those instances, I will always follow local and national safeguarding policies and the UKCP and BACP Standards of Conduct, Practice and Ethics.

### **Your rights**

I will try to be as transparent as I can be in terms of giving you access to your 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 <https://ico.org.uk/your-data-matters/>.

If I do hold information about you I will:

1. give you a description of it and where it came from.
2. tell you why I am holding it, tell you how long I will store your data and how I made this decision.
3. tell you who it could be disclosed to.
4. let you have a copy of the information in an understandable format.

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 [kirstenuttingtherapy@proton.me](mailto:kirstenuttingtherapy@proton.me)

If you have a complaint about how I handle your personal data, please do not hesitate to get in touch with me by emailing my 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 United Kingdom. For more information go to [ico.org.uk/make-a-complaint](https://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. I use encrypted devices and a locked filing cabinet.

### **Visitors to my website**

When you view my website, I collect the following data necessary for technical purposes to be able to demonstrate my website to you and to ensure adequate access stability and security.

### **My website's contact form:**

- When you get in touch via my contact form, you decide and choose what information you wish to share with me.
- Your information is not stored anywhere on my website platform. Your contact form goes directly through to me via email.

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

### **Content Management**

This website uses WordPress as the content management system - find out more here about <https://automattic.com/privacy/> and data protection.

### **Analytics**

This website is powered by Webhealer and it uses visitor data to work correctly.

This website collects personal data to power our site analytics, including:

- Information about your browser, network, and device
- Web pages you visited prior to coming to this website
- Your IP address

This information may also include details about your use of this website, including:

- Clicks
- Internal links
- Pages visited
- Scrolling
- Searches
- Timestamps

We share this information with Webhealer, our website analytics provider, to learn about site traffic and activity.

### **Caching**

This website uses Litespeed Cache to enhance performance and user experience. Temporary cached copies of web pages are stored and managed by the site administrator and are never shared with third parties. QUIC cloud services may process and cache data temporarily; see their privacy policy for details:

<https://www.quic.cloud/privacy-policy/>

### **Cookies**

This website uses session cookies to manage user sessions. These cookies are deleted when you close your browser and are not shared with third parties. You can block cookies via your browser settings, but this may limit website functionality.

### **Visitor data**

Forms:

When you submit information to this website via webform, we collect the data requested in the webform in order to track and respond to your submissions. 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.

Visitors:

When someone visits my website, I use a third-party service, WP Statistics 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 WP Statistics 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 WP Statistics so that I can continually improve my service to you, You can read WP Statistics privacy notice here:

<https://wp-statistics.com/privacy-policy>.

### **Integration of YouTube videos**

I have integrated YouTube videos into my website, which are stored on YouTube website and can be played directly from my website. These are all integrated in the “extended data protection mode”, i.e., no data about you as a user will be transmitted to YouTube if you do not play the videos. Only when you play the videos will the data be transmitted. I have no influence on this data transmission.

By visiting my website, YouTube receives the information that you have accessed the corresponding subpage of my website. This is independent of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your information will be directly associated with your account. If you do not wish to be associated with your profile on YouTube, you must log out before playing the video.

### **Disclaimer: Your role in protecting your own privacy**

I make every effort to ensure that my clients' personal information is held securely and to safeguard against unauthorised access, whether I receive it via my website, emails, text, over Zoom, or phone or in person.

At the same time, in agreeing to my privacy policy:

- You acknowledge that the privacy of your communications and personal information can never be completely guaranteed when it is being transmitted over the internet.
- You acknowledge and agree that you share information via the internet at your own risk.
- You agree to take responsibility for your own role in safeguarding your data privacy in the email address you choose to use and whether or not you choose to password protect information you send to me.

My policy is to request that clients endeavour to take the following actions wherever possible:

- To email me from an email address that does not have your full name in it
- To only include your first name in any documents you send me
- To password protect documents that you may send me