

I am committed to protecting your privacy and ensuring the confidentiality of your personal information. I follow the terms of the General Data Protection Regulation 2018 (GDPR) to ensure responsible and secure use of your data. As such I am registered with the Information Commissioner's Office (ICO), reference ZB181022, and comply with their requirements.

The GDPR refers to 'data controllers' and 'data processors.' For the purposes of my business (Tanya Gower Counselling and Therapy) I hold the roles of data controller and of data processor. I may also use third party intermediaries as data processors – including (but not limited to): my webhost and email providers; my webform providers; my phone company; my file electronic file storage, my business bank and accounting software. I have a legitimate interest in processing personal data to provide counselling, therapy, or supervision services.

The purpose of this statement is to let you know what personal information is collected and held, why it is collected, use of third parties, how long it is stored and your rights over your personal data. I am registered with the Information Commissioner's Office (ICO), reference ZB181022, and comply with their requirements.

1. Information I Collect

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:

Visitors to my website

My website is maintained by Webhealer. When someone visits my website, Webhealer collects standard internet log information and details of visitor behavior 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.

If you fill in a form on my website, information may be processed and held by intermediary services (e.g., Google) as well as being sent to my own business email accounts. This is consistent with the Lawful Basis of 'Legitimate Interest' in that a third party using a webform to contact me,

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knows that that information will be transmitted and stored electronically and expects that I will respond to, or otherwise action, their communication. You can view Webhealers privacy policy at https://www.webhealer.net/privacy-policy/.

If you are currently accessing my services or if you are in contact with me to consider counselling, therapy or supervision, 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, therapy or supervision services) and necessary for a contract with a health professional (in this case, a contract between me and you).

If you have had counselling, therapy or supervision with me and it has now ended, I will use legitimate interest as my lawful basis for holding and using your personal information.

2. My Use of this Information

Your information is used solely for the purpose of providing effective counselling, therapy or supervision services.

Initial Contact

When you enquire about services, I ask for contact details and relevant personal information from you that are needed to answer your enquiries, to keep you informed and to conduct a risk assessment, such as:

- **Personal details**: Name, date of birth, contact information and other relevant details such as third-party contacts in case of emergency
- Health information: Medical history, mental health concerns, treatment plans

Alternatively, your GP or other health professional may send me your details when making a referral for therapy or a parent or trusted individual may give me your details when making an enquiry on your behalf.

While you are accessing services

Your data will be used only to provide you with my services and to give you information relating to my services, such as:

- Scheduling and managing appointments
- Delivering therapeutic support
- Communicating with you about your care

- Processing payments
- Meeting legal and regulatory obligations, such as record keeping

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to conduct 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. These suppliers include (but are not limited to):

- Zoom for setting up online sessions,
- Mettle Bank, Freeagent and HMRC process payments and log regulatory information in relation to receipt of payments and tax returns.
- Microsoft Office 365, Google, and Samsung for:
 Email correspondence and scheduling appointments.

 Records of your personal details to help the counselling, therapy or supervision services run smoothly.
 - Written notes of each session; these are as brief as possible.

After counselling, therapy or supervision services have ended.

Once counselling, therapy or supervision services have ended your records are kept for 7 years from the end of our contact with each other (or in the case of young people, 7 years after your 18th birthday) and are then securely destroyed. For security reasons I do not retain WhatsApp or text messages for more than 1 year at the latest since the last message after counselling, therapy or supervision services have ended. If you want me to delete your information sooner than this, please tell me.

3. Security

I will take all reasonable precautions to prevent the loss, misuse, or alteration of information you give me.

Communications in connection with this service may be sent by email. For ease of use and compatibility, communications will not be sent in an encrypted form unless you require it and give me permission to communicate with you in that way. Email, unless encrypted, is not a fully secure means of communication. Whilst I endeavour to keep our systems and communications protected against viruses and other harmful effects, I cannot bear responsibility for all communications being virus-free.

4. Confidentiality and Disclosure

All information shared during sessions is kept strictly confidential. I will not disclose your information without your consent, except:

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- If there is a risk of harm to yourself or others
- To comply with professional or ethical obligations

5. Data Storage and Security

I store your data securely using encrypted systems and password-protected files, or in the case of paper notes in a locked cupboard. Access is restricted to authorised personnel only. I retain your records for the duration required by law or professional guidelines, after which they are securely destroyed.

6. Your Rights over Your Personal Data

If you would like to see the information, I hold about you, or would like to correct, update, or delete any records, please email me at tanya@tanyagower.co.uk.

If you have any concerns about our use of your data, please contact me directly at tanya@tanyagower.co.uk. I will do my utmost to resolve any concerns you have. If for any reason I cannot resolve the issues you may choose to contact the ICO directly.

7. Third-Party Services

I do not share your data with third parties for marketing purposes. If I use third-party platforms (e.g., for video sessions or payment processing), I endeavour to ensure they comply with relevant data protection laws.

8. Changes to This Policy

I may update this Privacy Policy from time to time. Any changes will be posted on our website and communicated to you as appropriate.

9. Contact Us

If you have any questions or concerns about this Privacy Policy or your data, please contact:

Tanya Gower Counselling and Therapy

Email: tanya@tanyagower.co.uk

Phone: 07960 440290