

Privacy Statement

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/coaching/development services 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 07930 333801.

'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 reference **A8953468**. My phone number is: 07930333801 and my email address is: <u>joanne@wrightinsight.co.uk</u>.

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, coaching or you have engaged with me for development services 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/coaching) and necessary for a contract with a health professional (in this case, a contract between me and you).

How I use your information

When you contact me with an enquiry about my services, I will collect information to help me satisfy your enquiry. This will include name, email and telephone number. Alternatively, your GP or other health professional or organisation 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 90 days. If you would like me to delete this information sooner, just let me know. While you are accessing counselling or coaching services. Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if I consider there to be risk of harm to yourself or another person or related to fraud or drug trafficking. 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/coaching services run smoothly. These details are kept securely either online with password protection and security software or in a locked filing cabinet and are not shared with any third party.

I will keep very brief written notes of each session, these are kept in a locked cabinet in a locked and alarmed room. For security reasons I do not retain text messages for more than 1 month. If there is relevant information contained in a text message I will transfer this to your file. Likewise, any email correspondence will be deleted after 1 months if it is not important. If necessary I will transfer it to your file.

After counselling/coaching/development services has ended.

Once counselling has ended your records will be kept for 2 years from the end 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. 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.

Privacy notice guide - 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 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 joanne@wrightinsight.co.uk.

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. I use a laptop with password protection and Kaspersky Total security protection. Paper files are stored in a locked filing cabinet in a locked and fully alarmed room.

Visitors to my website

When someone visits my website, I use a third party service. My website is hosted by Reg123 who collect 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 Reg123 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. Please see Reg123 website for further information on how they manage users of their software. Data protection and privacy policy | 123 Reg (123-reg.co.uk). No user-specific data is collected by me or any third party.

2. Cookies

The Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse the Site and also allows us to improve the Site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary/essential cookies.** These are cookies that are required for the operation of the Site. They include, by way of general example, cookies that enable you to log into secure areas of the Site, use a shopping cart or make use of e-billing services.
- Analytical/performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around the Site when they are using it. This helps us to improve the way the Site works by, for example, ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to the Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to the Site, the pages you have visited and the links you have followed. We will use this information to make the Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.