# Privacy Policy

TM Counselling (Pty) Ltd (Reg. No. 2024/125572/07)
Effective date: 01 October 2026

TM Counselling ("we", "us") is a multi-branch, Registered counselling practice serving clients across Johannesburg and Pretoria, and online throughout South Africa. We respect your privacy. This policy explains how we collect, use, share and protect your personal information when you use www.tmcounselling.co.za (the "Website") or contact us through it, in line with the Protection of Personal Information Act 4 of 2013 ("POPIA").

Scope. This policy covers the Website and enquiries made through it. Information you give us once you become a client (intake forms, consent forms, clinical notes) is governed by the consent forms you sign with your counsellor, our professional obligations under the Health Professions Act and HPCSA ethical rules, and POPIA.

## 1. Responsible party and Information Officer

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|---|---|
| Responsible party | TM Counselling (Pty) Ltd, Reg. No. 2024/125572/07 |
| Information Officer | Tricia Moodley |
| Contact | admin@tmcounselling.co.za \| 078 425 1137 |

## 2. What information we collect

Information you give us. When you complete the Contact form, we collect:

- First and last name, email address and phone number;
- your preferred counsellor or branch, whether you want in-person or online counselling, and how you prefer us to contact you (phone, WhatsApp or email);
- any message you choose to write.

Please do not include detailed clinical or health information in the message box**.** Share only what we need to arrange your first session. Your counsellor will collect clinical information in a consented setting. If you do tell us health-related details, we treat them as special personal information and handle them with extra care (see section 4).

WhatsApp. If you contact us by WhatsApp, we receive your number, profile name and the content of your messages, processed under WhatsApp's own terms and privacy policy.

## 3. Why we use your information

| Purpose | Legal basis (POPIA) |
|---|---|
| Responding to your enquiry and arranging an appointment | Steps taken at your request toward a contract; your consent |
| Contacting you in the way you chose | Your consent |
| Meeting legal, regulatory and professional obligations (HPCSA, tax, record-keeping) | Legal obligation |
| Keeping the Website and our systems secure | Legitimate interest |

We do not sell your personal information.

## 4. Who we share information with

We share information only with service providers ("operators") who process it for us under agreements that require them to keep it secure and confidential, and with others only where the law requires, e.g. we use Gmail and our e-mail is on Google (Gmail) servers.

## 5. Transfers outside South Africa

Some providers store or process data on servers outside South Africa.

## 6. Cookies

Cookies are small files stored on your device. Our Website uses essential cookies that make it work, and analytics cookies from Google Analytics. You can block or delete cookies in your browser settings. Blocking cookies will not stop you from contacting us.

## 7. How long we keep information

- **Website enquiries that do not lead to counselling:** up to 12 months, then deleted or anonymised.
- **Client records:** kept for the periods required by HPCSA guidelines and law (generally at least six years for adults, and longer for minors), then securely destroyed.

## 8. How we protect your information

We take reasonable technical and organisational measures to prevent loss, damage, unauthorised access or disclosure. These include access controls limited to staff who need the information, confidentiality undertakings for staff and counsellors, secure hosting, and password-protected systems. No internet transmission is completely secure, which is why we ask you not to send detailed clinical information through the Website form.

If a security compromise affects your personal information, we will notify the Information Regulator and you as POPIA requires.

## 9. Your rights

Under POPIA you may:

- ask whether we hold your personal information and request a copy;
- ask us to correct or delete information that is inaccurate, outdated, irrelevant or unlawfully held;
- object to the processing of your personal information, or withdraw consent at any time (this does not affect processing already done);
- object to direct marketing; and

To exercise a right, email admin@tmcounselling.co.za, marked for the attention of the Information Officer. We may need to verify your identity first and will respond within a reasonable time. Some clinical records must be kept by law, so a deletion request may be limited for those.

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| Information Regulator (South Africa) | JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001<br>Complaints: POPIAComplaints@inforegulator.org.za<br>Website: inforegulator.org.za |

## 10. Third-party links

The Website links to external sites such as WhatsApp, LinkedIn and YouTube. We are not responsible for their privacy practices and encourage you to read their policies.

## 11. Changes to this policy

We may update this policy from time to time. The latest version, with its effective date, will always be available on the Website. If changes are significant, we will take reasonable steps to let you know.

## 12. Contact us

Questions about this policy or your information? Contact the Information Officer at **admin@tmcounselling.co.za** or **078 425 1137**.