

Jan Royle

Counselling, Psychotherapy & Supervision

Privacy policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website to provide you with best experience when using our website.
- 1.5 In this policy, "we", "us" and "our" refer to *data controller Jan Royle*.

2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process[and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data].
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number. None of this is stored on the website.
- 3.6 Your email address will automatically be held in my email account but any emails that you send are deleted once they are read. I suggest that we use this form of communication to share only basic information and avoid any detail about the content of the therapy. No one else has access to my laptop and it is security protected.
- 3.7 Any text or Whats App messages you send will be held on my phone, we suggest we only use this type of messaging for arranging sessions and information around attendance. We hold your contact details on the mobile phone with your first name and the first letter of your surname, so that you are not identifiable. No one else has access to my mobile phone and it is security protected.
- 3.8 We hold the copy of the working agreement with the personal details you have provided, including: name, telephone, email, address and any medication.

- 3.9 We hold a handwritten diary with only your first name to indicate the date and timing of your sessions.
- 3.10 We hold handwritten information recording:
 - (a) First date of contact, the dates of all subsequent meetings, end date.
 - (b) Telephone number and email address if you've given this to me.
 - (c) Area you initially identified that has brought you to therapy.
- 3.11 We write handwritten notes following each session to record what areas have been explored in the session. These notes are only seen by myself and only used for the purposes of informing the therapeutic process.
- 3.12 All handwritten information is the property of the therapy service including the Working Agreement, Session dates and session notes are held in a locked filing cabinet that no one else has access to in my dedicated counselling room.
- 3.13 If there was to be any data breach, we would notify you as soon as possible.

4. Purposes of processing and legal bases

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Relationships and communications** - We may process contact data, and communication data for the purposes of managing our relationship and communicating with you by email, SMS and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.
- 4.3 **Security** - We may process your personal data for [the purposes of security and the prevention of any criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 4.4 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.5 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

4.6 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing your personal data to others

5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining professional advice.

5.2 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows:

- (a) Personal information including sessions notes will be retained for 5 years from the date of initial contact, after which they will be destroyed;
- (d) Emails are deleted directly after reading.

6.4 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6.5 Your name and contact details will be shared with a Therapeutic Executor in the case of death of the therapist, to contact you as part of the Therapeutic Will process. All personal information will be destroyed.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under General Data Protection Regulation (GDPR) and the Data Protection Act (2018).

7.2 Your principal rights under data protection law are:

- (a) **the right to access** - you can ask for copies of your personal data and we are required to provide within a month under GDPR;

- (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) **the right to erasure** - you can ask us to erase your personal data although we may decline this request whilst the data is required for competent therapeutic practice ;
- (d) **the right to complain to a supervisory authority** - you can complain about our use of your personal data; and
- (e) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

Please note that in couples therapy both parties need to consent to access the information and both will be provided with the information.

- 7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [https://edpb.europa.eu/our-work-tools/general-guidance/gdpr-guidelines-recommendations-best-practices_en and <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>].
- 7.4 You may exercise any of your rights in relation to your personal data [by written notice to us, using the contact details set out below].

8. About cookies

- 8.1 A cookie is a file containing an identifier a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 8.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

9. Cookies that we use

- 9.1 We use sessional cookies for the following purposes:
 - (a) **authentication and status** - we use cookies to identify you when you visit our website and as you navigate our website.
 - (b) **improve your experience** on the website.

10. Cookies used by our service providers

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 10.2 We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>

11. Amendments

- 11.1 We may update this policy from time to time by publishing a new version on our website.
- 11.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 11.3 We will not notify you of changes to this policy.

12. Our details

- 12.1 This website is owned and operated by *Jan Royle*.
- 12.2 We are ICO registered in England under registration number ZA433796, and our registered office is 12.3.
- 12.3 Our principal place of business is at *Conder Mill Cottage, Quernmore, Lancaster LA2 9EE*.
- 12.4 You can contact us:
 - (a) by post, to the postal address given above;
 - (b) using our website contact form;
 - (c) by telephone, on the contact number published on our website; or
 - (d) by email, using the email address published on our website.