



Privacy Notice

The General Data Protection Regulation (2018) requires me (the data controller) to let you know how I store and keep your personal information safe, and what your rights are.

The type of personal information I collect:

I currently collect and process the following information:

- *Personal identifiers, contacts, and characteristics* (for example, your name, date of birth, address and contact details).
- *Special category data* (for example, whether you have any criminal convictions or offences, info regarding your racial or ethnic origin, gender reassignment, health, religious or philosophical beliefs, sexual orientation).
- *Economic and financial data*.

How I get the personal information and why I have it:

The personal information I process is provided to me directly by you in order for us both to perform the counselling contract and develop our therapeutic relationship. In some cases personal information about you may be provided to me by another person. EG: your referrer, a health professional, or a member of your social network. I will let you know if this is the case.

I use your personal information to:

- Conduct a written assessment and start to get to know you, to decide if Brighter Days Counselling can meet your needs, and agree your therapeutic goals.
- Assess whether you qualify for the discounted fee rate if your total household income is under £24,999 per year by checking your latest 3 months of bank statements.
- Keep a copy of any contracts which you sign. EG: the Administrative Contract, and the Terms and Conditions.
- Send you an email invitation to a Google Meet video call if this is your chosen method of counselling.
- Enter your name and contact details on my private calendar booking facility on my website managed by Webhealer.
- Have brief communication with you (via phone, email, Whats App, Signal, or text message) to make any necessary changes to the counselling contract (eg: times, dates, method), and confirm any agreements we make during our work together.
- Process your payments.

- Keep a basic record of our work together, in order to keep track of your progress towards your goals in the therapeutic contract.
- Keep a written record of any agreement to release information to a third party. EG: Your GP.
- Keep a written record if I need to break confidentiality without your consent with regards to the [NCS Safeguarding Policy](#).

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases I rely on for processing this information is that:

- I have a contractual obligation.
- I have a legitimate interest.

How I store your personal information:

Digital Records

I securely store your information with care on my private laptop. I use password protection and encrypted folders. My passwords are strictly private and confidential, and known only to me. I install anti-virus software. When not in use, the BDC laptop is stored in a safe.

Audio Records

If you have given your consent for me to record our sessions, then I use the Voice Recorder App on the Brighter Days Counselling mobile phone. The recording is routinely deleted within 2 weeks.

The Brighter Days Counselling mobile phone is fingerprint, and password protected. Only I have access to it. I keep it turned off outside of my business open times, and store it inside a safe.

Communication Methods

- **Emails:** I use a secure hosted email service set up by the providers of my website, Webhealer. I also use a Gmail webmail account which is safeguarded by *Advanced Protection* (Google's strongest account security). Both email providers have the strongest Transport Layer Security (TLS) possible to make sure email data is protected. TLS is an encryption protocol that protects data when it moves between computers. However, a secure TLS connection requires that both the sender and recipient use TLS. If the receiving server doesn't use TLS, the email providers will still deliver messages, but the connection isn't secure. So, for your peace of mind please check if your email provider uses TLS to send and receive messages.
- **Texts:** SMS does not support end-to-end encryption.
- **Whats App & Signal:** Whats App & Signal chat apps use end-to-end encryption which is the gold standard level of security protection.

How long I store your information for:

All client records are stored for 3 years after ending your counselling sessions, as advised by my insurance company.

Who has access to your records:

- Yourself, under GDPR Legislation.
- A court, with a court order.
- A coroner.

Your data protection rights:

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you. Please contact me at suzie@brighterdayscounselling.com if you wish to make a request.

How to complain:

If you have any concerns about the use of your personal information, you can make a complaint to me at suzie@brighterdayscounselling.com

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>