

Privacy Policy (May 2018)

I, Elizabeth Riddell, am registered with the Information Commissioners Office (ICO) as the Data Controller for Elizabeth Riddell Counselling.

This policy is about how I store and use any information you may give me – as an enquiring, current and past client, or as a visitor to my website. It also states your privacy rights. This is in line with the EU General Data Protection Regulation (GDPR).

I only collect and store personal data about you for proper and lawful reasons to provide a safe and efficient service. Your information will only be processed if it meets at least one of the following grounds: contract and/or consent between us, legitimate interests of my service, a legal obligation.

Your personal data is never shared with anyone without your knowledge or consent, unless I am obligated legally and/or ethically e.g. duty of care to yourself or another in imminent, serious risk of harm, allegations of child abuse, threat of a serious committal of crime. Your consent to share such information about you is not required in such circumstances, however I would always be involving you as much as possible in the process and gaining your consent where possible.

1. The information I hold about you and how I store it:

- Your email address and emails from point of contact are stored in an online email account.
- Your contact form which details you name, address, contact number, email address, emergency contact/GP and email address is stored as a paper file only, in a locked filing cabinet.
- Your signed counselling agreement contract is stored as a paper file only, in a locked filing cabinet.
- I store anonymised brief notes about our sessions, using only your first initial and time of session for identity, kept in a locked filing cabinet.
- Financial records are held both on paper in a locked filing cabinet, and digitally on invoices sent to you by email. If you make payments by BACS, this information is stored by my bank and I am not able to delete this data.

2. How long I keep your data:

I will keep your data for three years after the end of your counselling process. After three years, all paper data including session notes will be shredded.

I will also delete all digital data after three years from our last session, however for technical reasons there are limits to the erasure of some digital information i.e. a technically competent person could find a way to access some data until the storage device is destroyed or securely wiped and reformatted.

2. i) The only exceptions to this are where:

- the law requires me to hold your personal information for a longer period or to delete it sooner;
- you exercise your right to have the information erased (where it applies) and I do not need to hold it in connection with any of the reasons permitted or required under the law;
- I bring or defend a legal claim or other proceedings during the period I retain your personal information, in which case I will retain your personal information until those proceedings have concluded and no further appeals are possible;
- in limited cases, existing or future law or a court or regulator requires me to keep your personal information for a longer or shorter period;
- If under 18; I have a legal obligation to keep client notes for seven years from the 18th birthday, at which time these notes will be shredded.

3. I will only share your personal information with a third party if:

- During my contact time with you I become aware that there is a safeguarding risk to either you or another person I will contact your emergency contact/GP given and/or the emergency services / where appropriate.
- Where you request me to do so if appropriate.
- Where I need to comply with a legal requirement to do so (e.g. a court order).

3. i) Who I share fully anonymised personal information:

The ethical codes for counsellors require that I have clinical supervision for my work as part of supporting best practice. Supervision is also confidential; I may take issues from our work together to my clinical supervisor and/or counselling colleagues- this is always anonymous, without disclosing any individual identities.

4. Your legal rights about the data I hold about you are:

- the right to access your personal information*
- the right to rectification of any inaccurate factual information
- the right to withdraw your consent to the non-essential processing of information**
- the right to request the erasure of your personal information

*To request access to your data, email me at elizabethriddellcounselling@gmail.com and you will receive the data within 28 days.

**You can withdraw consent to the use of your personal information and/or request its destruction however there are limits to this right laid down in the legislation. For example you cannot demand the destruction of records of financial transactions.

These are your Data Subject Rights and more information about these can be found on the Information Commissioners Office website: <https://ico.org.uk/>

5. Cookies Policy - Visitor Analytics

Visitor Analytics is a simple website analytics service which measures the traffic and visitors' general details of the customers' websites. Collecting these statistics, a website can make their visitors' experience better (e.g. which pages they visit and when, where they are approximately located, where does a user land first or if they are coming from a specific referral).

Basically, as a website owner using Visitor Analytics, I am using cookies to collect data about visitors' device type and screen size, approximate location, browser, OS, IPs, page visits, bounce rate, conversions and popular content on the website. All this data is pseudonymized and Visitor Analytics will never use the collected data to identify individual users or to match it with additional information on an individual user. Each visitor has control over the cookies placement.

5. i) How to control cookies:

You can control and/or delete cookies as you wish by checking your browser settings on each device - for details, see aboutcookies.org.

For further information, please check Visitor Analytics' [Terms Of Use](#), [Cookie Information](#) and [Opt-Out / Do Not Track](#).

6. Contact Me and Complaints

You can contact me at elizabethriddellcounselling@gmail.com if you have any questions or complaints about this policy.

Should you be dissatisfied with how I process your data or the outcome of any complaint process with me, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>