

# Privacy Policy



## ICO Compliance

Bconnected Therapy is registered with the Information Commissioner's Office (ICO) under registration number: **ZA838079**

I am committed to complying with the terms of the General Data Protection Regulations (GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and to the responsible and secure use of your data. Bconnected Therapy has a legitimate interest in processing personal data to provide therapy services and any information you request.

The purpose of this privacy policy is to advise what Bconnected Therapy will do with your personal information from initial point of contact through to after therapy has ended.

## Lawful basis

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. If you have had therapy with me 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) and necessary for a contract with a health professional (in this case, a contract between me and you).

## Information about you

I collect personal information from you when you enquire about therapy for legitimate interests to set up an initial appointment. This information includes contact details, your availability and other relevant personal information needed to answer your enquiries and to keep you informed. Alternatively, your GP or other health professional 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 two weeks. If you would like me to delete this information sooner, just let me know.

Rest assured that everything you discuss with me is confidential. However, there are boundaries and limits to confidentiality in certain cases. Exceptions to confidentiality would be if you shared something that led me to believe:

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- you or others are or seem to be in danger or at serious risk of being harmed
- a child or vulnerable adult was at risk

or if:

- you infer involvement in or knowledge of an act of terrorism, money laundering or drug trafficking
- I am required to disclose due to a subpoena (Court order or coroner instructions)

In such cases I am ethically bound to take this information to the appropriate people. However, if this situation ever arose, I would always hope to discuss this with you beforehand if possible and to support you to make the appropriate disclosure yourself.

It is important that if we are working virtually, that you work in a safe confidential space and you are responsible for your confidentiality in your home and for ensuring emails received are kept confidential to you.

## Security

I take the security of the data I hold about you very seriously and as such I take precautions to prevent the loss, misuse or alteration of information you provide. I will keep brief written notes of each session and these are kept securely. For security reasons I do not retain text messages after therapy has ended. Likewise, any email correspondence is deleted.

Communications in connection with this service such as worksheets and session links may be sent by email. Communications may be sent in an encrypted form and this will be discussed with you. Email, unless encrypted, is not a fully secure means of communication. Whilst I endeavour to keep our systems and communications protected against viruses and other harmful effects, I cannot bear responsibility for all communications being virus-free.

## Your rights over your personal data

Under the General Data Protection Regulations (GDPR) 2018, you have certain rights. These are:

- You are allowed to see your notes. This is facilitated by making a formal request. If you would like a copy of any personal information, please email Bconnected Therapy.
- Having your records amended (change of name and address).
- In the case of clients under 18, records are kept for 5 years after the child turns 18.
- Under GDPR, you can request your data to be erased. However, there are exceptions to this. In the case of counselling records, insurance companies and ethical bodies ask for records to be available for a period of 7 years after termination of therapy and then destroyed.

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.

You can read more about your rights at [www.ico.org.uk/your-data-matters](http://www.ico.org.uk/your-data-matters). If you have any concerns regarding the use of your data, please contact me directly. I will do my utmost to resolve any concerns you have. If for any reason I cannot resolve the issues you may choose to contact the Information Commissioner's Officer (ICO), the statutory body that oversees data protection law in the UK.

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## What other data is collected?

### IP Addresses

When Bconnected Therapy's website is visited, your IP address which identifies your computer when connected to the internet, will be automatically logged by the website provider (Wix).

### Cookies

A Cookie is a piece of information that is stored on your computer's hard drive. When someone visits the website, standard internet log information and details of visitor behaviour patterns is collected to analyse website traffic. This may be used to develop and improve Bconnected Therapy's website and services in response to need. Legitimate interest is the lawful basis for using personal information in this way. You can read Wix privacy policy here <https://www.wix.com/about/privacy>. If you fill in a form on the website, that data will be temporarily stored on the web host before being sent to me.

### Social Media

My website allows you to access social networking sites. In order to allow functionality from social media networks, third party cookies are used. I have no control over these cookies, so it is advisable to visit the respective social media site and review their individual cookie policy.

Bconnected Therapy should be advised of any contact information changes to ensure information is up to date.

### The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### Bconnected Therapy contact details:

Telephone: 07415480301  
Email: [deborah.creedy@protonmail.com](mailto:deborah.creedy@protonmail.com)  
Location: Glasgow, Scotland

Helpline number: 0303 123 1113

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

**This privacy policy is regularly reviewed to ensure it continues to protect client privacy. I would welcome any suggestions for improving my data protection procedures.**