

I, Clare O' Boy, am the Data Controller and Processor of East Finchley Counselling.

The basis on which I keep client data is that of "Legitimate Interests". This means that the data is necessary for me to fulfil the contract that we have together (i.e. to provide therapy) and that it is data that you would reasonably expect me to hold and use.

For those who enquire about therapy, the data I hold includes any information you have sent me by email/text/message.

For those who book and attend at least one session, the data I hold includes:

- **Basic information such as name, email address, phone number**
- **Information that you give me as part of the work we do together**
- **Records of what interventions that I use (or potentially do not use) in our sessions**
- **Emails, texts and/or messages that are sent between us**
- **Information sent from any third party, e.g. GP, insurance company, EAP, occupational health provider.**

Some of the information that you give me may fall under the definition of special category of data as defined by the General Data Protection Regulation. The condition for processing this special data is "processing is necessary for medical diagnosis, the provision of health care or treatment pursuant to contract with a health professional".

Data is not shared with anyone, except possibly your GP, and for any reasons covered by the Requirements for Disclosure which are detailed and discussed when we first meet. My accountant will see bank, credit card and Paypal records which will contain any information that you submit when making payment. If you would like me to redact your identifiable data before sending to the accountants then please let me know.

The data is primarily used to enable me to provide therapy or supervision for you. It may also be used scientific research purposes and statistical purposes.

Details of where data is held:

- **Any emails sent between us are held either on my computer's hard drive or exchange server or if archived, in Dropbox or OneDrive. Both of these are secure cloud based storage services and are also GDPR compliant. Any emails that may be held on my mobile phone are code protected.**

- Any texts/Whatsapp messages/Messenger messages sent between us (See Social Media and Electronic Information section) are held on my mobile phone which is code protected.
- Your personal data is kept in a locked filing cabinet but my session notes are stored separately in either OneDrive or Dropbox. A coding system enables me to know whose notes are whose, but a stranger seeing the notes would not be able to identify who they referred to.
- If you use Paypal or online banking then clearly these systems will hold your data. I will download from these systems for accounting purposes and the resulting spreadsheets are held in Dropbox. When sent to my accountants, they will be password protected.

Your data is kept for 7 years. The length of time is based on the stipulation of my insurer. After this time any paper records are shredded and computer records permanently deleted.

I take the security of data seriously and as such:

- All data is held securely (see details of where data is held above)
- Any data transmitted is sent encrypted where possible
- For accounting purposes Excel spreadsheets are used

However:

- I am not in control of data (including emails and texts) which you send me
- Apps such as Facebook routinely access any information held and this is beyond my control.

If there is any breach of data security East Finchley Counselling will give full details to the Information Commissioners Office and any person affected within 72 hours of the breach and do all possible to minimise any potential impact.

You have rights with regards to the data held:

- The right of access. I will provide you with all data I hold on you as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).

- **The right to rectification.** If any data I hold is incorrect, just let me know and I will correct it as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).
- **The right to erasure.** If you wish me to erase your data just let me know and I will delete any computer records and shred any paper records as soon as I can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness). NB: data may be retained for scientific research, historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing but this would never include case notes or data such as address/email/phone
- **The right to restrict processing.** This would usually be a stop-gap measure before correction of any errors or before erasure
- **The right to data portability.** This might apply if you want your notes sent to another therapist for example, but it is likely that the easiest solution would come under the right to access, i.e. I would send the data to you.
- **The right to object to:**
 - **Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).** I do not engage in these things.
 - **Direct marketing.**
 - **Processing for purposes of scientific/historical research and statistics.** For this, you must provide grounds for your objection.
 - **Automated decision making and profiling.** I do not engage in automated decision making or profiling.

Cookies

Like many websites, I use cookies. A cookie is a small amount of data that is sent to your computer or mobile phone browser from a website's computer and is stored on your device's hard drive.

Cookies record information about your online preferences. They help me understand how visitors engage with my site so that I can improve your online experience with me. I do not use cookies to collect personally identifiable information about you.

Each website you visit can send its own cookie to your browser if your browser's preferences allow it. To protect your privacy, your browser only

permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites.

How to control and delete cookies;

You may restrict or block the cookies which are set by our website, or any other website, through your browser settings. You can also ask your browser to alert you when a cookie is issued.

For more information about cookies and how to manage them is available at www.aboutcookies.org

I use Google Analytics to understand how visitors engage with my websites. It collects information anonymously and reports website trends without identifying individual visitors. For more information visit [Google Analytics privacy and security information](#).