

Counselling Calm Psychotherapy & Coaching <u>hanna@counsellingcalm.com</u> <u>www.counsellingcam.com</u> 07532753855

# **PRIVACY NOTICE**

When you trust us with your personal data, we take our responsibility to protect it very seriously. We respect privacy and your rights to control your personal data. With that in mind, we want to be clear about the data we collect and why.

#### 1. Who are we?

Hanna Ehlers-Bond, trading as Counselling Calm, holds some information about you. In accordance with Government GDPR Regulation, this document outlines how that information is used, with whom that information may be shared and how it is kept secure. This notice does not provide exhaustive detail. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the <u>hanna@counsellingcalm.com</u>. We keep our Privacy Notice under regular review. This Privacy Notice was last reviewed in October 2022.

We reserve the right to change, modify, add or remove portions of this Privacy Policy from time to time. We will not however, retroactively change how we share your personal information without your consent. We will provide notice of any material changes through Hanna Ehlers-Bond services or by any other means as we deem appropriate before they take effect.

# 2. What We Do

Hanna Ehlers-Bond / Counselling Calm provides mental and emotional healthcare in the form of therapy / counselling sessions, coaching support and alternative health practices such as sound healing and energy healing. These services for clients aim to improve their confidence, and mental, emotional, and physical health and wellbeing. This is done through building cognitive awareness and greater selfawareness in general, using mindfulness, many therapeutic tools, coaching strategies, and restorative and relaxing meditative practices, with sound, energy, and guided visualisation. The focus is on overall psychological empowerment, the optimisation of overall physical, mental, and emotional health. Additionally, with a focus to support and create positive improvement, regards chronic health conditions, or the alleviation of mental health issues such as anxiety and depression.

Hanna Ehlers-Bond occasionally offers workshops, and short courses where participants may be asked to share personal information such as e-mail contact details when joining.

#### 3. How Your Personal Data is obtained



Counselling Calm Psychotherapy & Coaching <u>hanna@counsellingcalm.com</u> <u>www.counsellingcam.com</u> 07532753855

# Information provided by you

You provide us with personal data in the following ways:

- By completing a therapy or coaching client form and contract
- By signing a consent section of the questionnaire as legally required by BACP
- During a therapy consultation
- By e-mail, over the telephone or by post
- By potentially providing an online payment address (in the form of PayPal email)

This may include the following information:

- basic details such as name, address, contact details and next of kin
- details of contact we have had with you such as referrals and appointment requests
- health information including your previous medical history, lifestyle, any conditions recorded, details of previous therapy, medicine details, psychological history, clinic notes, counselling notes, and health improvement plans
- GP contact information
- Bank details (only in the case of over-payment)

We use this information to provide you with direct healthcare. This means that the legal basis of our holding your personal data is for legitimate interest.

Following completion of your healthcare we retain your personal data for the period defined by our professional associations and registrant bodies: The British Association for Counselling and Psychotherapy (BACP), The National Counselling Society (NCS) and for our insurance at Balens Ltd to remain valid. This enables us to process any complaint you may make. In this case the legal basis of our holding your personal data is for contract administration.

# 4. How we use your personal data

We act as a data controller for use of your personal data to provide direct healthcare and psychological support. We act as a data controller and processor regarding the processing of credit card and online payments.

We undertake at all times to protect your personal data, including any health and contact details, in a manner which is consistent with our duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data storage.



We may use your personal data where there is an overriding public interest in using the information e.g. in order to safeguard an individual either yourself or another in serious danger, or to prevent a serious crime. Also, where there is a legal requirement such as a formal court order. We may use your data for marketing purposes such as newsletters, but this would be subject to you giving us your express consent.

# 5. Do you share my information with other organisations?

We will keep information about you confidential. We will only disclose your information with other third parties with your express consent with the exception of the following categories of third parties:

- Our registrant body and professional associations, BACP and NCS, for the processing of a complaint made by you and Balens Ltd as insurance provider
- Any contractors and advisors that provide a service to us or act as our agents on the understanding that they keep the information confidential
- Any legal or crime prevention agencies and/or to satisfy any regulatory request (e.g., BACP or NCS) if we have a duty to do so or if the law allows us to do so

We will seek your express consent before sharing your information with your GP or other healthcare providers. However, if we believe that your life is in danger then we may pass your information onto an appropriate authority (such as the police, social services in the case of a child or vulnerable adult, or GP in case of self-harm) using the legal basis of vital interests.

We have a professional duty to take anonymised cases to a clinical supervisor to ensure the care being provided is up to standard and to have a second professional opinion.

We may also, very occasionally share your case history in an anonymised form with our peers for the purpose of professional development. In the form of meetings. conferences, online forums, and through publishing in medical journals, trade magazines or online professional sites. In this last case, we will seek your explicit consent before processing your data in this way.

# 6. What are your rights?

Every individual has the right to see, amend, delete, or have a copy, of data held that can identify you, with some exceptions. You do not need to give a reason to see your data.



If you require access to your data, you must make a subject access request in writing to <u>hanna@counsellingcalm.com</u>. Under special circumstances, some information may be withheld. We shall respond within 20 working days from the point of receiving the request and all necessary information from you. Our response will include the details of the personal data we hold on you including:

- Sources from which we acquired the information
- The purposes of processing the information
- Persons or entities with whom we are sharing the information

You have the right, subject to exemptions, to ask to:

- Have your information deleted
- Have your information corrected or updated where it is no longer accurate
- Ask us to stop processing information about you where we are not required to do so by law or in accordance with the BACP and NCS guidelines and for Insurance purposes through Balens Ltd.
- Receive a copy of your personal data, which you have provided to us, in a structured, commonly used, and machine-readable format and have the right to transmit that data to another controller, without hindrance from us.
- Object at any time to the processing of personal data concerning you

We do not carry out any automated processing, which may lead to automated decision based on your personal data.

If you would like to invoke any of the above rights, then please email hanna@counselling calm.com

# 7. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with GDPR. This requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

Within the health sector, we also must follow the common law duty of confidence, which means that, where identifiable information about you has been given in confidence, it should be treated as confidential and only shared for the purpose of providing direct healthcare. We will protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data



so that unauthorised users cannot see or make sense of it). We ensure external data processors that may support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

Hanna Ehlers-Bond, is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the ICO website (search by business name).

# 8. How long do you hold confidential information for?

All records held by Hanna Ehlers-Bond / Counselling Calm, will be kept for the duration specified by guidance from our professional association BACP and our insurers, Balens Ltd. This is currently a duration of seven years. After this time documents are shredded securely.

#### 9. Website technical details

Hanna Ehlers-Bond has two websites for information purposes but please read on specially about the use of your data when interacting with our websites. Some of these uses will depend entirely on how you choose to interact with the functions, such as making an email enquiry or purchasing a workshop from an online store.

#### What information do you collect from your websites?

We receive, collect, and store any information you enter on our website. In addition, we collect the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information and purchase history. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We also collect personally identifiable information (including name, email, password, communications); payment details (including credit card information), comments, feedback, product reviews, recommendations, and personal profile.

If you conduct a transaction on our website, as part of the process, we collect personal information you give us such as your name, address, and email address. Your personal information will be used for the specific reasons stated above only

#### Why do you collect this personal data from your websites?

We collect such Non-personal and Personal Information for the following purposes:



Counselling Calm Psychotherapy & Coaching <u>hanna@counsellingcalm.com</u> <u>www.counsellingcam.com</u> 07532753855

- 1. To provide and operate the Services.
- 2. To provide our Users with ongoing customer assistance and technical support
- 3. To be able to contact our Visitors and Users with general or personalized service-related notices and promotional messages.
- 4. To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we or our business partners may use to provide and improve our respective services.
- 5. To comply with any applicable laws and regulations.

# How do you store, use share, and disclose your site's visitor's personal data?

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

# How do you communicate with site visitors?

We may contact you to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed (if ever using an online shop), to poll your opinions through surveys or questionnaires, to send updates about our company, or as otherwise necessary to contact you to enforce our User Agreement, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email.

There are also optional data forms on the websites:

1. Forms

We do use electronic forms on our website making use of an available 'forms module' which has a number of built-in features to help ensure privacy. We also aim to use secure forms where appropriate.



Counselling Calm Psychotherapy & Coaching hanna@counsellingcalm.com www.counsellingcam.com 07532753855

# 2. Cookies

In compliance with EU legislation, the following table lists the use of cookies on these two web sites operated by Hanna Ehlers-Bond: www.thephoenixwoman.com www.counsellingcalm.com

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	12 Months	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 Minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 Months	Essential
_wix_browser_sess	Used for system monitoring/debugging	Session	Essential
consent-policy	Used for cookie banner parameters	12 Months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 Minutes	Essential
fedops.logger.X	Used for stability/effectiveness measurement	12 Months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 Months	Functional

Cookies are small. We do not make use of cookies to collect any private or personally identifiable information. The technical platform of this website uses cookies solely to aid the proper technical functioning of the website. The cookies used contain random strings of characters alongside minimal information about



the state and session of the website – which in no way collects or discloses any personal information about you as a visitor.

Advanced areas of this site may use cookies to store your presentation preferences in a purely technical fashion with no individually identifiable information. Also note our statement on analytics software below – as analytics software also uses cookies to function.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit <u>www.allaboutcookies.org</u>

To opt out of being tracked by Google Analytics across all websites visit <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>

Please be aware the websites of <u>www.thephoenixwoman.com</u> and <u>www.counsellingcalm.com</u> may have some links to third party websites, that are not covered by this Privacy Notice, such as social networking websites and other various memberships organisations.

Please be sure to choose your cookie setting preferences when you visit the websites run by Hanna Ehlers-Bond, using the pop-up banner provided.

3. Your Payments

Payments taken in an online shop via the website at <u>www.thephoenixwoman.com</u> are processed by PayPal and your data is covered by the safeguards of the PayPal providers.

#### 10. Data Taken Via Signable

We use Signable to have therapy contracts signed. Occasionally pre-therapy forms may also be taken via email through signable.co.uk. In this case you will be sent a password protect to shield your data on a document.

You can read about their privacy policy and GDPR statement here: <u>Signable</u> <u>Security Information</u>

#### 11. Data Taken Via Online Calendar (Squarespace / Acuity)

We use an online calendar at Acuity to provide you with easy booking of sessions. You do not have to agree to booking via the online calendar. You will be asked on first contact regarding booking a session if you want to be



added to the system. The data used for appointments is your full name and email. If you sign up to this, please ensure you use an email that you feel comfortable having email notifications about therapy. You will receive a booking confirmation email and a reminder email about your appointment. You can choose to be erased from this system at any time.

You can find out more about how Squarespace /Acuity protects your data here: <u>https://support.squarespace.com/hc/en-us/articles/115012540827</u>

# 12. Analytics

Like most websites, we make use of analytics software to help us understand the trends in popularity of our website and of different sections. We make no use of personally identifiable information in any of the statistical reports we use from this package. We use an analytics package called Google Analytics who provide details of their <u>privacy policy</u> on the Google website.

# 13. Newsletter

Like most businesses, Hanna Ehlers-Bond utilises a newsletter. We only send promotional and marketing communications with your consent. When you opt into the mailing list, either with verbally indication, via email inquiry, or online sign-up, your email and name is taken. If you no longer wish to receive these communications from Hanna Ehlers-Bond, you can either unsubscribe directly by clicking the unsubscribe button at the end of an email newsletter or via express written notice to hanna@counsellingcalm.com.

Please report any improper collection, or misuse of personal information provided on the newsletter service or websites to <u>hanna@counsellingcalm.com</u>

# 14. Complaints

If you have a complaint regarding the use of your personal data, then please contact us by e-mail at hanna@counsellingcalm.com and we will do our best to help you.

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint to the Information Commissioner's Office (ICO), you can contact them on 01625 545745 or 0303 1231113.