

Chloe McDowell Counselling Privacy Policy

Date: 17/7/22

Information Commissioners Office (ICO) reference: ZB344926

Data controller and processor: Chloe McDowell

Data subjects: Clients

This policy is written with the intention of providing transparent information regarding how Chloe McDowell Counselling processes personal data. To find out more about General Data Protection Regulations (GDPR) and your rights, please go to <https://ico.org.uk/for-the-public/> or <https://ico.org.uk/global/contact-us/>

Contact details:

Name: Chloe McDowell

Address: East Cliff, Stotfield Road, Lossiemouth, Moray, IV31 6QT

Phone Number: 07831 386172

E-mail: counsellor.chloe@gmail.com

Web address: www.chloemcdowellcounselling.com

The type of personal information we collect:

We currently collect and process the following information:

Full name

Age

Home address

Mobile or home telephone number

Email address

GP name and address

Emergency contact and telephone number

Other information collected/processed regarding clients:

Session notes made in anonymised form, identifiable only by unique client codes.

Text messages

Emails

How we collect personal information and why we have it:

Most of the personal information we process is provided to us directly by you.

Enquiries to Chloe McDowell Counselling are received via a number of channels, in person, telephone, text or email. Initial enquiries usually contain some personal information such as names, emails and telephone numbers. Emails are received via: marketing on counselling directories, by using a contact form on Chloe McDowell Counselling website or direct contact independent of these methods.

Any client data collected and/or retained by Chloe McDowell Counselling (including personal information) is processed in order to make relevant contact with and provide a counselling service to clients. And to comply with any legal or professional body responsibilities that ensue in the delivery of counselling services.

Third party data collection & processing:

Chloe McDowell Counselling website is hosted by Siteground, see their privacy policy [here](#)

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

We have a 'legitimate interest'.

Health data falls under 'special category'. My condition for processing clients' data is for the purpose of 'health and social care' provision.

Data storage, retention & disposal

Your information is securely stored.

Chloe McDowell Counselling stores paper records, including personal information in a locked filing cabinet and electronic information is password protected and encrypted format (including email, telephone numbers and text). Telephone numbers are anonymised, with those and any text messages being held on a password protected mobile phone.

Session/counselling notes are electronically held and separate from personal details. Notes are kept in an anonymised format to protect client identity.

Data is held for a minimum of 7 years after client's last contact with Chloe McDowell Counselling, in line with legal and professional body requirements. After this time, data is then disposed of securely and confidentially via deletion of electronic records, and shredding of paper records.

For clients under 18, notes are kept until their 25th birthday or 7 years after counselling ends, whichever is later.

Data sharing

It is rare that any personal information would be shared. [COSCA](#) registered counsellors, share anonymised client information with professional supervisors (supervision is a required for registration in order to maximise service provision to clients). Personal information will not be shared with any other party without prior client consent, with the exception where Chloe McDowell Counselling believes that not sharing the information would result in immediate risk of substantial harm to self or others; or under a legal requirement, (e.g. terrorism, drug money laundering; or via court order for disclosure).

In the event that Chloe McDowell is in some way incapacitated, all records will be destroyed by her supervisor. Every effort will be made to ensure current clients are informed of this action.

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, we have one month to respond to you.

Please contact us at counsellor.chloe@gmail.com 07831 386172 if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using details at the top of this privacy policy.

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

The ICO's address:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF.

ICO Helpline number: 0303 123 1113, website: <https://www.ico.org.uk>