

# WENDY COOK PRIVACY POLICY

## Introduction

Your privacy is very important to me, and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me.

I adhere to current data protection legislation and am registered with the Information Commissioner's Office registration number ZB571145 under WJC Counselling Ltd, Company registration number 14985898.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your therapy has ended.

I am happy to chat through any questions you might have about my data protection policy, and you can contact me via the details below.

Phone: 07443 356503  
Email: [wendy@wjccounselling.co.uk](mailto:wendy@wjccounselling.co.uk)  
Website: [wjccounselling.co.uk](http://wjccounselling.co.uk)  
Postal address: Wendy Cook, WJC Counselling Ltd, 47 Summersbury Drive, Shalford, Guildford, Surrey GU4 8JG

## My lawful basis for holding and using your personal information

The General Data Protection Regulation (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. I have explained these below:

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).

## **How I use your information**

### **Initial contact**

When you contact me with an enquiry about my counselling services I will collect information to help me satisfy your enquiry. This may include your name, contact details, date of birth, family circumstances, occupation, any psychological diagnosis, medication and GP. Alternatively, your GP or other health professional may send me your details when making a referral or a 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 three months. If you would like me to delete this information sooner, just let me know.

### **While you are accessing counselling**

Rest assured that information you provide to me, either from your initial enquiry or through your support will remain confidential unless I have your consent to share it and, in these cases, we will discuss it together first.

Should your notes be requested by a third party (i.e., a solicitor), I will require a signed declaration from yourself, and will not hand over any notes without your permission. Before any notes are sent, I would recommend that we have the opportunity to sit down together and explore the situation.

There are certain legal obligations where it is necessary to break confidentiality without your consent. For example, if you disclose a risk of harm to yourself or someone else (including a child), a serious crime (including drug trafficking, money laundering or terrorism) or if I am compelled by Court Order.

Your identifiable paper based signed Client Agreement, Privacy Policy, personal and contact details are kept in a locked filing cabinet to which only I have access. I will keep brief, anonymised notes to help counselling sessions run smoothly. These are kept securely on Apple devices which are password protected under a User Name only I have access to. Notes are held under a second layer of password security and backed up using encryption. Contact details on my work iPhone are anonymised and the device is secured by a password.

For security reasons I do not retain text messages or emails for more than three months. If there is relevant information contained in a text message or email I will record brief notes in line with the above policies and delete the electronic communication.

In line with my professional guidelines, I have regular supervision with a practitioner who is also bound by the same confidentiality regulations as I am. During supervision only the client's first name is used. Only myself and if something happens to me, my supervisor, will have access to client details.

## After counselling has ended

Once counselling has ended your records will be kept for six years from the end of our contract with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

## Third party recipients of personal data

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

Suppliers with whom I have a contractual relationship are:

NatWest Bank [Business Current Account] will process information relating to any bank transfers made to or from my account. See their privacy policy:

<https://www.natwest.com/global/cookie-privacy.html>

FreeAgent [an accounting software package] will process information relating to any bank transfers made to or from my business current account with NatWest. See their privacy policy: <https://www.freeagent.com/website/privacy/>

WebHealer [website hosting service] will process information relating to any enquiry you may make via my website. See their privacy policy: <https://www.webhealer.net/privacy-policy/>

Apple [iCloud backup services & FaceTime] will process information stored on my Apple devices. See their privacy policy: <https://www.apple.com/legal/privacy/>

Talkmobile [mobile phone service] will process information relating to any mobile communication we may have. See their privacy policy: <https://talkmobile.co.uk/new-privacy>

## Your rights

You have the right to ask for a copy of your personal information, free of charge. You also have the right to ask me to amend, update, delete or limit how I use your personal information or to stop processing your personal information. You can read more about your rights at [ico.org.uk/your-data-matters](https://ico.org.uk/your-data-matters).

To make a request for any personal information I may hold about you, please put the request in writing addressing it to [wendy@wjccounselling.co.uk](mailto:wendy@wjccounselling.co.uk).

If you have a complaint about how I handle your personal data please do not hesitate to get in touch with me by writing or emailing to the contact details given above. I would welcome any suggestions for improving my data protection procedures.

If you want to make a formal complaint about the way I have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information go to <http://ico.org.uk/make-a-complaint>.

## Client Consent

I have read this Privacy Policy carefully and I understand it. I agree that any personal details, including medical information which I choose to provide, may be recorded and stored as described in this policy. I also agree that Wendy may contact me by phone and/or email in relation to our work together or with relevant information about her practice. I understand that I may withdraw my consent at any time.

If sessions are held online, I agree to working in the ways outlined in the additional Online Agreement and accept that while every effort will be made to ensure the confidentiality of online sessions, this cannot be guaranteed.

Print Name: \_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Counsellor Signature: \_\_\_\_\_ Date: \_\_\_\_\_



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