



Privacy Notice

Introduction

Your privacy is very important to me. You can be confident that your personal information will be kept safe, secure, and used only for the purposes it was given. I adhere to current UK data protection legislation, including the UK GDPR, the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR).

This privacy notice explains how I handle your personal information from your first enquiry through to after therapy has ended, including:

- what personal data I collect and why
- the lawful bases I rely on
- how long I keep your information
- who I share data with and why
- your data protection rights
- how to raise concerns or complaints

I'm always happy to talk through any questions. You can contact me at navigatinglifetherapy@pm.me.

As a sole-practitioner therapist, I am the **data controller** for the personal information you provide.

My lawful basis for processing your personal information

Under the UK GDPR, I must have a lawful basis for processing your personal data. These depend on the stage of our work together.

When you enquire about therapy

I process the information you provide (usually contact details and a brief description of what you're looking for) under:

- **Article 6(1)(b) – Contract** Processing is necessary to respond to your enquiry and provide information about therapy.

If you decide not to proceed, your information is deleted within **6 months**, based on **legitimate interests**, allowing me to respond to follow-up enquiries and maintain accurate business records.

When you are having therapy

To provide therapy, I must process personal and special category data. The lawful bases are:

- **Article 6(1)(b) – Contract** Processing is necessary to deliver counselling services.
- **Article 9(2)(h) – Provision of health or social care** This is the correct lawful basis for processing special category data such as mental health information.

I do **not** rely on consent for special category data, because therapy cannot be meaningfully provided without processing this information, and consent must be freely withdrawable.

After therapy has ended

I retain your records for **7 years**, based on:

- **Article 6(1)(f) – Legitimate interests**
- **DPA 2018 Schedule 1, Part 1(2) – Provision of health or social care**
- **Article 9(2)(f) – Establishment, exercise or defence of legal claims**

Clinical notes cannot be deleted earlier if they are required for legal, safeguarding, or professional obligations.

How I use your information

Initial contact

When you contact me, I collect the information you choose to share so I can respond to your enquiry. If you do not proceed, your information is deleted within 6 months unless you request earlier deletion.

During therapy

Everything you discuss with me is confidential. Confidentiality may be broken only if:

- you request that I share information
- I believe there is a risk of serious harm to you or someone else
- there are child protection concerns
- disclosure is required by law (e.g., terrorism, drug trafficking, money laundering)

- a court order requires disclosure

I will always try to discuss this with you first unless safeguarding concerns prevent it.

I keep brief factual notes of each session. These are stored securely in **Bacpac**, an encrypted, therapist-specific database with two-factor authentication.

Your personal details are also stored in Bacpac to allow therapy to run smoothly.

If I become incapacitated due to illness, accident, or death, a trusted therapist colleague (named in my clinical will) will access **only your contact details** to inform you of the situation. They cannot access clinical notes.

Email and messaging

- My email is provided by **ProtonMail**, an encrypted service accessed via password-protected devices.
- Emails are deleted after 6 months unless needed for your clinical record.
- Text messages or WhatsApp messages store your number; my phone is password-protected.

Supervision

I receive clinical supervision to ensure safe and effective practice. Information shared in supervision is **anonymised or pseudonymised**. Supervisors do not receive identifiable personal data.

After therapy has ended

Your records are retained for **7 years** and then securely deleted. Clinical notes cannot be deleted earlier if required for legal defence, safeguarding, or professional obligations.

Third-party recipients of personal data

I sometimes share personal data with carefully selected third-party providers who support my practice. These providers do not use your information for any purpose other than the task they are contracted for.

These include:

- **ProtonMail** – encrypted email
- **Microsoft 365** – secure, password-protected software
- **Bacpac** – encrypted clinical records database
- **HMRC** – financial records may include your name if you pay by bank transfer

- **ICO** – regulatory oversight

No clinical notes are shared with any third party unless legally required.

Your rights

You have the right to:

- access the personal information I hold about you
- request correction of inaccurate information
- request erasure (where legally possible)
- request restriction of processing
- object to processing
- request a copy of your data in an intelligible format

To make a request, please email me at navigatinglifetherapy@pm.me. I will respond within **28 days**.

Data security

I take data security seriously. I use:

- encrypted devices
- encrypted email
- encrypted databases
- password protection
- access controls
- secure storage
- regular security reviews

If a data breach occurs that affects your personal information, I will notify you and the ICO within **72 hours**, as required by law.

Concerns or Complaints

If you have concerns about how I handle your personal data, you are welcome to raise them with me so I can try to resolve them.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at any time. You do not need to raise your concern with me first, and doing so will not affect the care or service you receive.

The ICO can consider concerns about how your personal data is collected, recorded, used, stored, or shared — including concerns about how clinical information is documented. They cannot review or intervene in clinical decisions or therapeutic processes.

Information Commissioner's Office (ICO)

Website: ico.org.uk

Telephone: 0303 123 1113

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Visitors to my website

My website is hosted by **Site123**, which processes standard internet log information and visitor behaviour patterns. This data is anonymised before I receive it.

I use **legitimate interests** as the lawful basis for processing anonymised analytics data to improve my website and services.

Like most websites, mine uses cookies. You can choose to opt out through your browser settings. Turning off cookies may affect how well the website functions.

If you complete an enquiry form, your information is temporarily stored by the web host before being sent to me via email.

ICO Registration

I am registered with the Information Commissioner's Office. Registration number: **ZB750816**

Contact Information

If you have any questions or wish to exercise your data rights, please contact:

Sarah Read , Navigating Life Therapy

Email: navigatinglifetherapy@pm.me

Phone: 07551 153165

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