

Glenda Wood Registered Counsellor & Hypnotherapist

Privacy Notice

This Privacy Notice sets out details of the information that Glenda may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully.

This Privacy Notice:

- provides you with a detailed overview of how I will manage your data, from the point at which it is gathered and onwards.
- will give you all the details you need on how I use your information, and how I will comply with the law in doing so.
- will clarify that I do not use your information for marketing purposes or marketing materials.
- sets out your rights in respect of your personal information and how to exercise them. You can, for instance, seek access to your personal information, object to me using your information and request rectification of any information which is inaccurate.

How to contact me

If you would like further information about any of the matters in this Privacy Notice or have any other questions about how I collect, store or use your personal information, please contact me using the details below.

Glenda Wood
27 Whitlock Drive
Great Yeldham
Halstead
Essex CO9 4EE
07421 710775

Your personal data

As your therapist I will make decisions about what information is collected about you and I may maintain my own set of clinical records in relation to the treatment provided. I am a Data Controller in respect of your personal information which I hold within those records, meaning that I must comply with the data protection legislation and relevant guidance when handling your personal information. To the extent relevant to my practice, you can expect me (including my secretaries) to handle your information in line with this Privacy Notice. This includes using your personal information as set out in more detail below.

I am expected to handle your personal data in accordance with the principles set out within this Privacy Notice. This means that whenever I use your personal data, I will only do so as set out in this Privacy Notice.

If you have any concerns about the way I have handled your personal information please contact me.

What personal information do I collect and use from clients?

The personal information that I collect will depend on your relationship with me. I will collect different information depending on whether or not you are already a client of mine. I may use “special categories of personal information” (otherwise known as “special categories of data”) about you, such as information relating to your physical and mental health. For example, if you are a client I will need to use information about your health in order to treat you.

If you provide personal information to me about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. I will process such information in accordance with this Privacy Notice.

In addition, you should note that in the event you amend data which I already hold about you (for instance, your address) then I will update my records to reflect the amendments. My records will continue to store historical data.

Personal information

As a client the personal information I hold about you may include the following:

- Name
- Contact details, such as postal address, email address and telephone number (including mobile number)
- Financial information, such as credit card details used to pay us
- Occupation
- Emergency contact details, including next of kin
- Background referral details

Special Categories personal information

As a client I will hold information relating to your therapeutic treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. The special categories of personal information I hold about you may include the following:

- Details of your current or former physical or mental health. This may include information about any therapeutic care you have received (from other therapeutic care providers such as GPs, psychiatrists or hospitals (private and/or NHS)) or need, including about clinic and hospital visits and medicines administered. I provide further details below on the manner in which I handle such information.
- Details of services you have received from me
- Details of your nationality, race and/or ethnicity
- Details of your religion
- Data concerning your sex life and/or sexual orientation
- Family details
- Details of previous therapy
- Medication taken
- GP details
- Date of birth
- Short and long term goals

The confidentiality of your medical information is important to me and I make every effort to prevent unauthorised access to and use of information relating to your current or former physical and mental health. In doing so, I comply with UK data protection law, including the Data Protection Act 2018, and all applicable professional bodies associated to the work I carry out.

From 25 May 2018, the current Data Protection Act was replaced by the EU General Data Protection Regulation (GDPR) and a new Data Protection Act. All uses of information I collect will comply with the GDPR and the new Data Protection Act from that date onwards.

How do I collect your information?

I may collect personal information from a number of different sources including, but not limited to:

- GPs
- Psychiatrists
- Other counselling, psychotherapy and hypnotherapy practices, both NHS and private
- Mental health providers
- Commissioners of therapeutic care services
- Therapists (including their secretaries)
- The client's employers

Directly from you:

Information may be collected directly from you when:

- You enter into a contract with me for the provision of therapeutic services
- You use those services
- You complete enquiry/contact forms on the Glenda Wood website
- You submit a query to me including through my website or by email or text
- You correspond with me by letter, email, telephone, including where you reference Glenda Wood in a public social media post

From other therapeutic care organisations:

My clients can sometimes receive therapeutic care from other organisations in addition to me, and so in order to provide you with the best treatment possible I may have to collect personal information about you from other organisations. These may include:

- Medical records from your GP
- Medical records from your therapist (including their secretaries)
- Medical records from the NHS or any private therapeutic care organisation. Medical records include information about your diagnosis, clinic and hospital visits and medicines administered.

From third parties

As detailed in the previous section, it is often necessary to seek information from other therapeutic care organisations. I may also collect information about you from third parties when:

- You are referred to me for the provision of services including therapeutic care services
- I liaise with your current or former employer, health professional or other treatment or benefit provider
- I liaise with your family
- I liaise with your insurance policy provider
- I deal with experts (including medical experts) and other service providers about services you have received or are receiving from us
- I deal with NHS health service bodies about services you have received or are receiving from us

How will I communicate with you?

In order to communicate with you, I am likely to do this by telephone, SMS, email, and/or post. If I contact you using the telephone number(s) which you have provided (landline and/or mobile), and you are not available which results in the call being directed to a voicemail and/or answering service, I may leave a voice message on your voicemail and/or answering service as appropriate.

However:

- to ensure that I provide you with timely updates and reminders in relation to your therapeutic care (including basic administration information and appointment information (including reminders)), I may communicate with you by SMS and/or unencrypted email (where you have provided me with your email address) in each case where you have expressed a preference in the client registration form to be contacted by SMS and/or email.
- to provide you with your therapeutic information and/or invoicing information, I may communicate with you by email (which will be encrypted) where you have provided me with your email address and have expressed a preference in the client registration form to be contacted by email. The first time I send you any important encrypted email eg one that I am not also sending by post or which requires action to be taken, I will endeavour to contact you separately to ensure that you are able to access the encrypted email you are sent.
- If I have your mobile number or your email address I may use this method of communication to contact you regarding client surveys which are for the purpose of improving my service or monitoring outcomes and are not a form of marketing.

Please note that although providing your mobile number and email address and stating a preference to be communicated by a particular method will be taken as an affirmative confirmation that you are happy for me to contact you in that manner, I am not relying on your consent to process your personal data in order to correspond with you about your treatment. As set out further below, processing your personal data for those purposes is justified on the basis that it is necessary to provide you with therapeutic care services.

What are the purposes for which your information is used?

I may 'process' your information for a number of different purposes, which is essentially the language used by the law to mean using your data. Each time I use your data I must have a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data. When the information that I process is classed as "special category of personal information", I must have a specific additional legal justification in order to use it as proposed.

Generally I will rely on the following legal justifications, or 'grounds':

- Taking steps at your request so that you can enter into a contract with me to receive therapeutic care services from me.
- For the purposes of providing you with care pursuant to the contract between us. I will rely on this for activities such as supporting your treatment or care and other benefits, supporting your doctor, nurse, carer or other therapeutic care professional and providing other services to you.
- I have an appropriate business need to process your personal information and such business need does not cause harm to you. I will rely on this for activities such as quality assurance, maintaining my business records, developing and improving my products and services and monitoring outcomes.
- I have a legal or regulatory obligation to use such personal information.
- I need to use such personal information to establish, exercise or defend my legal rights.
- You have provided your consent to my use of your personal information.

Note that failure to provide your information further to a contractual requirement with me may mean that I am unable to set you up as a client or facilitate the provision of your care on my records.

I provide further detail on these grounds in the sections below.

Appropriate business needs

One legal ground for processing personal data is where I do this in pursuit of legitimate interests and those interests are not overridden by your privacy rights. Where I refer to use for my appropriate business needs, I am relying on this legal ground.

Special categories of personal information includes information about your:

- Health
- Sex life
- Sexual orientation
- Ethnicity
- Political opinions
- Religious or philosophical beliefs
- Genetic or biometric information

The right to object to other uses of your personal data

You have a range of rights in respect of your personal data, as set out in detail in the section entitled "Your rights". This includes the right to object to me using your personal information in a particular way (such as sharing that information with third parties), and I must stop using it in that way unless specific exceptions apply. This includes, for example, if it is necessary to defend a legal claim brought against me, or it is otherwise necessary for the purposes of your ongoing treatment.

You will find details of my legal grounds for each of my processing purposes below. I have set out individually those purposes for which I will use your personal information, and under each one I set out the legal justifications, or grounds, which allow me to do so. You will note that I have set out a legal ground, as well as an 'additional' legal ground for special categories of personal information. This is because I have to demonstrate additional legal grounds where I am using information which relates to a person's therapeutic care, as I will be the majority of the times I use your personal information.

Purpose 1: To set you up as a client on my system

Legal ground: Taking the necessary steps so that you can enter into a contract with me for the delivery of therapeutic care.

Additional legal ground for special categories of personal information: The use is necessary for reasons of substantial public interest.

Purpose 2: To provide you with therapeutic care and related services

The reason you come to me is to provide you with therapeutic care, and so I have to use your personal information for that.

Legal grounds:

- Providing you with therapeutic care and related services
- Fulfilling my contract with you for the delivery of therapeutic care

Additional legal grounds for special categories of personal information:

- I need to use the data in order to provide therapeutic care services to you
- The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent

Purpose 3: For account settlement purposes

I will use your personal information in order to ensure that your account and billing is fully accurate and up-to-date

Legal grounds:

- My providing you therapeutic care and other related services
- Fulfilling my contract with you for the delivery of therapeutic care
- My having an appropriate business need to use your information which does not overly prejudice you

Additional legal grounds for special categories of personal information:

- I need to use the data in order to provide therapeutic care services to you
- The use is necessary in order for me to establish, exercise or defend my legal rights

Purpose 4: Communicating with you and resolving any queries or complaints that you might have.

From time to time, clients may raise queries, or even complaints, and I take those communications very seriously. It is important that I resolve such matters fully and properly, and so I will need to use your personal information in order to do so.

Legal grounds:

- My providing you with therapeutic care and other related services
- My having an appropriate business need to use your information which does not overly prejudice you

Additional legal grounds for special categories of personal information:

- The use is necessary for the provision of therapeutic care or treatment pursuant to a contract with a health professional
- The use is necessary in order for us to establish, exercise or defend my legal rights

Purpose 5: Communicating with any other individual that you ask me to update about your care and updating other therapeutic care professionals about your care.

In addition, other therapeutic care professionals or organisations may need to know about your treatment in order for them to provide you with safe and effective care, and so I may need to

share your personal information with them. Further details on the third parties who may need access to your information is set out in purpose 8 below.

Legal grounds:

- My providing you with therapeutic care and other related services
- I have a legitimate interest in ensuring that other therapeutic care professionals who are routinely involved in your care have a full picture of your treatment

Additional legal ground for special categories of personal information:

- I need to use the data in order to provide therapeutic care services to you
- The use is necessary for reasons of substantial public interest under UK law
- The use is necessary in order for me to establish, exercise or defend my legal rights

Purpose 6: Complying with our legal or regulatory obligations, and defending or exercising our legal rights

As a provider of therapeutic care, I am subject to a wide range of legal and regulatory responsibilities which is not possible to list fully here. I may be required by law or by regulators to provide personal information, and in which case I will have a legal responsibility to do so. From time to time, I may be the subject of legal actions or complaints; in order to fully investigate and respond to those actions, it is necessary to access your personal information (although only to the extent that it is necessary and relevant to the subject-matter).

Legal grounds:

- The use is necessary in order for me to comply with my legal obligations

Additional legal ground for special categories of personal information:

- I need to use the data in order for others to provide informed therapeutic care services to you
- The use is necessary for reasons of the provision of health or social care or treatment or the management of health or social care records
- The use is necessary for establishing, exercising or defending legal claim

Purpose 7: Managing my business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (eg tax or legal advice)

In order to do this, I will not need to use your special categories of personal information and so I have not identified the additional ground to use your information for this purpose.

Legal grounds:

- My having an appropriate business need to use your information which does not overly prejudice you

Purpose 8: Provide marketing information to you (including information about other products and services offered by selected third party partners) in accordance with preferences you have expressed in discussion with your therapist

As a business, I need to carry out marketing but I am mindful of your rights and expectations in that regard. As a result, I will only provide you with marketing which is relevant to my business and only where you have specifically confirmed your consent to do so.

Legal grounds:

- My having an appropriate business need to use your information which does not overly prejudice you
- You have provided your consent

Who do I share your information with?

From time to time, I may share your personal information with third parties.

Disclosures to third parties:

I may disclose your information to the third parties listed below for the purposes described in this Privacy Notice. This might include:

- A doctor, psychiatrist, nurse, carer or any other therapeutic care professional involved in your treatment
- Other members of support staff involved in the delivery of your care, like receptionists and secretaries
- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer
- NHS organisations
- Other private sector therapeutic care providers
- Your GP
- Third parties who assist in the administration of your therapeutic care, such as insurance companies
- Government bodies, including the Ministry of Defence, the Home Office and HMRC
- My professional bodies such as BACP, UKCP, NCS, NHS, GHR.
- The police and other third parties where reasonably necessary for the prevention or detection of crime
- My insurers
- My third party services providers such as IT suppliers, accountants, lawyers, document management providers and tax advisers
- Selected third parties in connection with any sale, transfer or disposal of my business

I may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

Under no circumstances will your personal information be used for marketing purposes or marketing materials.

How long do I keep information for?

I will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations.

If you would like further information regarding the periods for which your personal information will be stored, please contact me for further details.

Your Rights

Under data protection law you have certain rights in relation to the personal information that I hold about you. These include rights to know what information I hold about you and how it is used. You may exercise these rights at any time by contacting me using the details set out above at the top of the page.

There will not usually be a charge for handling a request to exercise your rights.

If I cannot comply with your request to exercise your rights I will usually tell you why.

There are some special rules about how these rights apply to health information as set out in legislation including the General Data Protection Regulation as well as any secondary legislation which regulates the use of personal information.

If you make a large number of requests or it is clear that it is not reasonable for me to comply with a request then I do not have to respond. Alternatively, I can charge for responding.

Your rights include:

The right to access your personal information

You are usually entitled to a copy of the personal information I hold about you and details about how I use it.

Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (eg by email) the information will be provided to you by electronic means where possible.

Please note that in some cases I may not be able to fully comply with your request, for example if your request involves the personal data of another person and it would not be fair to that person to provide it to you.

You are entitled to the following under data protection law.

Under Article 15(1) of the GDPR I must usually confirm whether I have personal information about you. If I do hold personal information about you I usually need to explain to you:

- The purposes for which I use your personal information
- The types of personal information I hold about you
- Who your personal information has been or will be shared with, including in particular organisations based outside the EEA.
- If your personal information leaves the EU, how I make sure that it is protected
- Where possible, the length of time I expect to hold your personal information. If that is not possible, the criteria I use to determine how long I hold your information for
- If the personal data I hold about you was not provided by you, details of the source of the information
- Whether I make any decisions about you solely by computer and if so details of how those decisions are made and the impact I may have on you
- Your right to ask me to amend or delete your personal information
- Your right to ask me to restrict how your personal information is used or to object to my use of your personal information
- Your right to complain to the Information Commissioner's Office

I also need to provide you with a copy of your personal data.

The right to rectification

I take reasonable steps to ensure that the information I hold about you is accurate and complete. However, if you do not believe this is the case, you can ask me to update or amend it.

The right to erasure (also known as the right to be forgotten)

In some circumstances, you have the right to request that I delete the personal information I hold about you. However, there are exceptions to this right and in certain circumstances I can refuse to delete the information in question. In particular, and for example, I do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercising or defending legal claims.

The right to restriction of processing

In some circumstances, I must "pause" my use of your personal data if you ask me to. I do not have to comply with all requests to restrict my use of your personal information. In particular, for example, I do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercising or defending legal claims.

The right to data portability

In some circumstances, I must transfer personal information that you have provided to me to you or (if this is technically feasible another individual/ organisation of your choice. The information must be transferred in an electronic format.

The right to withdraw consent

In some cases I need your consent in order for my use of your personal information to comply with data protection legislation.

I have explained in the section entitled “What are the purposes for which your information is used?” where I rely on your consent in this way. Where I do this, you have the right to withdraw your consent to further use of your personal information. You can do this by contacting me by means of the details at the top of the page.

The right to complain to the Information Commissioner’s Office

You can complain to the Information Commissioner’s Office if you are unhappy with the way that I have dealt with a request from you to exercise any of these rights, or if you think I have not complied with our legal obligations.

More information can be found on the Information Commissioner’s Office website:<https://ico.org.uk/>

Making a complaint will not affect any other legal rights or remedies that you have.

Updates to this Privacy Notice

I may update this Privacy Notice from time to time to ensure that it remains accurate. In the event that these changes result in any material difference to the manner in which I process your personal data then an updated copy of the Policy will be listed on my website. The most up-to-date version can always be found at: <https://www.GlendaWood.co.uk/privacy-policy/>.

In the event that there are any material changes to the manner in which your personal information is to be used then I will provide you with an updated copy of this Privacy Notice.

This Privacy Notice was last updated on 10th July 2018.