

## Privacy Policy

**Counsellor: Lisa | Data Controller**

Your privacy is vital to me. This policy outlines how I handle your personal data following the General Data Protection Regulation (EU/2016/679), the Data Protection Act 2018, and the ethical standards of the **British Association for Counselling and Psychotherapy (BACP)**.

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### **1. Who I Am**

I am Lisa, a counsellor operating under **Crescentia Counselling**. I am registered with the **Information Commissioner's Office (ICO)** – C1673812.

I am the **Data Controller**, which means I am responsible for deciding how your personal information is collected, stored, and used.

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### **2. The Lawful Basis for Processing Your Information**

Under GDPR, I must have a lawful basis for processing your data. The bases that apply in our work include:

- **Contract:** If you are currently receiving counselling or have made an enquiry, I use your data to provide counselling services as per our agreement.
  - **Legitimate Interest:** If counselling has ended, I may retain your data for a set period (see below) for legal, ethical, or professional reasons.
  - **Special Category Data:** Information about your mental health is processed under the provision of health treatment and is necessary for the counselling contract between us.
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### **3. What Information I Collect and Why**

#### **Initial Contact:**

When you reach out (via phone, email, or web form), I collect information such as:

- Your name
- Contact details
- Brief information relevant to arranging counselling

If you decide not to proceed, I will delete your information within **[insert timeframe]**, unless you request an earlier deletion.

### **During Counselling:**

I keep:

- Basic personal information (e.g., name, contact number, GP)
- Brief notes on each session
- Payment and appointment records

This is essential for managing our sessions and providing you with ethical and effective counselling.

### **After Counselling Ends:**

I retain your records securely for **7 years** after which they are safely destroyed. If you request deletion sooner, I will comply unless retention is required by law or ethical obligation.

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## **4. Confidentiality and Exceptions**

Everything discussed in counselling is confidential. However, there are exceptions:

- If I believe you are at serious risk of harm to yourself or others
- If there are concerns around child protection or safeguarding vulnerable adults
- If required by law in cases of **terrorism, treason**, or court orders

In most cases, I will attempt to speak with you before breaching confidentiality unless there are safeguarding reasons not to.

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## **5. Data Storage and Security**

Your data is stored securely:

- **Paper notes** are locked in a secure filing cabinet
- **Electronic records** are stored on password-protected, encrypted devices through our Internal Management System.
- I do not retain text messages longer than **30 days**.
- Emails are deleted after **30 days** unless relevant to counselling

All efforts are made to protect against unauthorised access, misuse, or data loss.

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## **6. Third-Party Data Sharing**

I will never sell or share your personal data for marketing. I may share data with:

- Emergency services, if required for your safety
  - My clinical supervisor (anonymously and ethically)
  - Digital service providers such as [insert names of cloud storage, email, or practice management systems], all of whom comply with GDPR and have signed data processing agreements
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## 7. Your Rights

You have rights under GDPR, including:

- To access a copy of the data I hold about you
- To request correction of inaccurate data
- To ask for data deletion or restriction of processing
- To object to data processing
- To withdraw consent at any time (where applicable)

Requests can be made in writing to [lisa@crescentiatherapy.co.uk](mailto:lisa@crescentiatherapy.co.uk). You also have the right to complain to the ICO at: <https://ico.org.uk/make-a-complaint>

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## 8. Use of Cookies and Website Analytics (if applicable)

If you visit the Crescentia Counselling website:

- We may use cookies to improve user experience
- We may use Google Analytics to collect non-identifiable visitor data
- No user-specific data is collected without your consent

You will be asked to opt-in to any non-essential cookies.

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## 9. Policy Updates

This privacy policy may be updated from time to time. The latest version will always be available on my website or by request.

If you have any questions about this policy or how your data is handled, please feel free to contact me.

10. Policy Sign-Off

Policy creation date (v1):	10/04/2025
Date of next review (v2):	10/04/2026
Signature:	