

PEAK THERAPY

HOME VISIT COUNSELLING

PEAK THERAPY HOME-VISIT COUNSELLING: WEBSITE AND GDPR PRIVACY STATEMENT.

In accordance with *General Data Protection Regulation* (GDPR) We have updated our Privacy Policy, effective from May 25, 2018, to clarify how we collect and process your personal data.

The data controller is Peak Therapy Home-Visit Counselling c/o Aron Kirk (Psychotherapist)
Peak Therapy Home-Visit Counselling is registered with the Information Commissioners Office ICO:ZA428919

Privacy Statement: In line with *General Data Protection Regulation* (GDPR), any personal information you send via this website, will only be used in order for me to contact you. Your personal details will not be retained for any other purpose, nor will they be shared with any other organisation. By contacting me you are agreeing to me holding your information for the purpose of contacting you only.

Peak Therapy Home-visit Counselling Private Policy:

When you trust us with your personal data, we take our responsibility to protect it very seriously. We respect privacy, and your rights to control your personal data. With that in mind, we want to be clear about the data we collect and why. The prime purpose of collecting your data is to provide you with services ("Services") offered by our website ("Site"), whether that's using our Site to find information, to contact a professional, our aim is to allow you to interact with it as effortlessly as possible. We do not and will not sell your data to third parties or any other affiliation.

Your Personal Information:

The 'Contact Form' on this website requires that you give us certain parts of your personal information. This may be names, addresses, email addresses and telephone numbers. We do not store personal information about individuals who visit this site except where they provide contact information to arrange use of the Peak Therapy Home-visit Counselling service. If the service is used, your personal information will be kept on file, securely. This will be explained in further detail at the initial 'intake session' (should you decide to use the service on offer) when the paper-work is compiled and completed for records.

Any information you provide will only be used only for the reasons specified, and it will not be shared with any third party, organisation or company without your consent, unless:

- you have consented to this (for example by providing information to us after we've told you that we will supply the information to a third party)
- it is as part of our duty to protect a child, a vulnerable adult, yourself or the public
- for the prevention and detection of a crime or the assessment of any tax or duty
- we are required to do so by any court or law or any relevant regulatory authority
- to protect the rights, property or safety of Peak Therapy Home visit Counselling or any third parties (for example for the purposes of fraud protection)
- we transfer our rights and duties to provide products and services to another organisation

Where you have used our service, we will keep your contact details and details of the services we have provided to help us provide future services for you. Your contact details are kept securely, and are only retained by us if you continue to use the service provided. Any held addresses, email addresses, telephone numbers, geographic locations are destroyed if you decide not to use the service after your initial contact or 'intake session'.

Internet and Cookies:

If you are connected to the Internet, you will have an IP Address. This may take the form of a figure, such as 333.333.22.1. The IP address may be automatically collected and logged as part of the connection of your computer to our web server and website. This data is not collected and used by Peak Therapy Home-visit Counselling Service for any other purposes, nor is it stored or shared with any other parties, companies organisation or affiliates.

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website. The rules on cookies are covered by the Privacy and Electronic Communications Regulations. The Regulations also cover similar technologies for storing information, eg Flash cookies. The Regulations were revised in 2011, and the Information Commissioner's Office (ICO) is responsible for enforcing these rules.

The domain: **peaktherapy.co.uk** has been thoroughly analysed by both Cookiebot and Cookie-Checker to determine if it is compliant with EU regulations regarding cookies and online tracking. The conclusion found was that **peaktherapy.co.uk** does not use any first party or third party cookies. However, from time to time, there may be links to affiliated websites or organisations regarding counselling and affiliated therapies, all or some of which will contain cookies and have their own customised cookie policy.

It is sometimes advisable to be extra vigilant and cautions by deleting and/or blocking cookies. If you want to delete or block cookies you can do so by using your browser's settings. If you would like detailed instructions as to how to do this we recommend you take a look at the guides at: **ico.org.uk**.

Please Note: our use of our website without modifying these cookie settings means that you consent to our use of cookies regrading affiliated websites and/or organisations.

Mobile Phone Network: Three UK is a British telecommunications and internet service provider and supply me with my mobile phone network. Three UK take their own steps to secure my network.

How to delete and block our cookies

If you want to delete or block our cookies you can do so using your browser's settings. If you would like detailed instructions as to how to do this we recommend you take a look at the guides at **ico.org.uk**. Your use of our website without modifying these cookie settings means you consent to our use of cookies.

Links and other organisations:

There may be times when the Peak Therapy Home-Visit Counselling website may contain links to other websites, companies, organisations or affiliated parties. Peak Therapy Home-Visit Counselling is not responsible for the privacy practices of other companies, websites or organisations, and recommends you consult the privacy information on any such aforementioned website or organisation.

Changes To This Policy And Independent Advice:

This policy will be reviewed and updated versions will be posted on the website as changes in regulations and laws are introduced. If you have any questions about the use of your personal information, the Information Commissioner's Office (ICO) is the independent regulator for both Data Protection and Freedom of Information.

Analytics:

My website host/sever, 123 reg, collects behaviour patterns of website visitors. This does not identify individuals but shows three things. : The number of site visits. 2: The number of specific page views. 3: The type of device used. (eg: mobile, desktop, laptop, tablet etc) I. also use Google analytics as a third party company. This also collect behaviour patterns of website visitors. This information does not identify individuals but shows a collection of website usage from the number of website visits, frequently used pages. I am also connected to, but not affiliated with, the Counselling Directory, which will have a separate Privacy Statement and Cookies procedure. Please see their website for further information on any such policy or procedure

Google's use and ability to share information collected via Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

For more information please see: **<https://policies.google.com/privacy>**

Website 'Contact Me' Button:

No information from the 'contact me' button is stored by the website. I use the personal data of your email address for correspondence with you regarding your enquiry about the services of Peak Therapy Home-Visit Counselling. I only retain the information for the period in which we are in correspondence and then it is deleted as confidential waste I do not use the information you supply via the 'contact me' button for marketing purposes, neither do I share it with third parties unless I am required to do so by law.

I use BT-mail when responding to website enquiries. BT-mail encrypts messages in transit using TLS Transport Layer Security. on a basic level this means that emails cannot be read nor intercepted by third parties in transit. You probably have no idea if your email provider uses TLS so please bear in mind that sending information by email can't always be guaranteed secure so please consider the level of personal information you share in an email.

Google servers are primarily based in the US. Gmail as part of google is covered by the US privacy shield (this is a level of approved security to pass information from UK to the US) so by definition your personal data of email address and IP address may go outside of the EEA. For more information please see: <https://www.privacyshield.gov/list>

General data protection regulation GDPR information for Peak Therapy Home-Visit Counselling.

This statement details how I collect, store or share/process your personal data including special category data. The following collected information applies should you wish to become a counselling client of Peak Therapy Home-Visit Counselling.

- Full name/s
- Contact telephone numbers
- email addresses
- Address and/or Geographic Location
- Date/s of birth
- GP Surgery and GP Details
- Emergency contact, name/s and telephone number/s (should we become unable to contact you for whatever reason)

The above information is used as contact and/or emergency contact information while you are in counselling within the terms of the counselling Agreement (sometimes referred to as the counselling contract) I only use this data and/or information in relation to the adequate delivery of my services. I do not use it for marketing purposes, neither do I or sell any data and/or information to third parties, unless you have specifically asked me to pass on any aspects of your information and/or date to any other party and/or organisation.

There are very specific limited counselling reasons why I may need to and/or be required to share/process your data.

Legitimate interest:

1. It may become necessary during our work together for me to break confidentiality for safeguarding reasons; serious harm to self or others, acts of terrorism and/or drug trafficking, money laundering and child protection issues. The personal data/information shared will be adequate and proportionate (eg: the minimum required). Your information may also be shared with health professionals & emergency services as appropriate.

2. Clinical will. In the event of my death or becoming incapacitated, a family member will pass on a sealed envelope from my secure storage containing name and contact details of my current clients to my clinical supervisor. This is to enable my supervisor to make contact re my situation and to discuss counselling options going forward to maintain your safety. My clinical supervisor follows the same confidentiality system as myself.

Legal obligation:

1. I may be required to share information in your notes if I am issued with a court order.

2. I keep anonymous notes from our sessions in line with the requirements of my professional indemnity insurance and the limitation act Special category data 9 (f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Your Consent:

1. If you ask me to, I will share your information/data/records with other medical professionals or your legal representative.

Home Visits (secondary person record access – in the event of emergencies):

As a Home-Visiting counsellor, I have assigned someone to have access to my locked and/or my electronic records of client information/data should an emergency situation arise. This is only accessed in extremely rare circumstances where I may be of potential threat and/or danger, whilst working within another property, home, or geographical location. (eg: being held against my will or being attacked)

This declared secondary individual will know where I am at all times, for the purposes of my own safety and well-being. This secondary individual has signed a document which binds them to complete confidentiality in the access to records/information/data. This is explained in more detail within the *Peak Therapy Policy and Procedure* which is available upon the client's request, once they have entered a therapeutic alliance with the counsellor.

How long do I keep your information? (Data retention schedule):

1. If you choose not to continue with counselling after your initial assessment session your information will be disposed of two weeks after as confidential waste.

2. If you choose to continue with counselling I keep client notes that are anonymous and separately name/email address for 7 (seven) years after your last session in line with the requirements of my professional indemnity insurance.

Your rights under GDPR Right to be informed:

- Right to access (you can request to see and/or be given information I hold about you)
- Right of rectification,
- Right to erasure (Not applicable to lawful reason and/or legal obligation)
- Right to restrict processing,
- Right to data portability (Not applicable to lawful reason and/or legal obligation and/or legitimate interest)
- Right to object (Not applicable to lawful reason and/or legal obligation)
- Rights related to automated decisions.

It should be noted that the ICO says these are not all absolute rights for more information:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you have any concerns about how I have used your data you can discuss it with me in the first instance if you feel able to. My contact details are: **peaktherapy@btinternet.com**

You also have the right to complain to the information commissioner's office (ICO) Telephone: 0303 123 1113

This privacy statement is kept under regular review. Last updated: May 22nd 2018