

# Privacy Policy - Grace Transformation Therapy 2022

## The Short, Less Complicated, More Personal Version....

Your feelings of safety and trust with me, knowing that all you share will be kept entirely confidential is of the utmost importance to me. Your privacy will always be honoured and respected – that is how we will both achieve the fastest, most effective empowering results for you which is always my heartfelt goal.

It is an honour to be entrusted with often delicate information and all personal details you share with me verbally or in writing will never be shared with any party except in exceptional circumstances; at your request, or by court of law or if you or anyone involved with you is in danger.

And now for the more legal GDPR bit.....

## Privacy Policy Overview

This privacy policy outlines your rights, and my obligations to you, with regard to the recording and storage of your personal information. In this privacy policy I will let you know what information I need to collect from you before we begin therapy, and what information I need to collect from you during therapy. I will also set out how I will look after your personal information and for how long I will store it. In addition, I will let you know what you are able to request from me with regard to this information.

## Your Personal Information

The Data Protection Act 1998 (DPA) defines personal information as any information that can be used to identify a living individual. Individuals can be identified by various means including their name, address, email address or telephone number.

I need to process your personal information in order to fulfil my contractual obligations to you as a therapy practitioner, for example to assess whether I am able to offer you therapy in the first place, and then to deliver effective therapy to you if therapy commences. Your personal information helps guide both my assessment process and my clinical decision-making during therapy.

My contractual obligations to you as a therapy practitioner are the lawful basis for my processing of your personal information.

## Protecting Your Personal Information

The DPA and the General Data Protection Regulation (GDPR) require that all organisations that store personal information about people may only do so provided that the information is processed

- lawfully
- fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept in a form that permits identification of information subjects for no longer than is necessary for the purposes for which the personal information are processed
- processed in a manner that ensures appropriate security of the personal information.

### **Collection of Your Personal Information**

Your personal information will be collected via my website, [www.gracetransformationtherapy.com](http://www.gracetransformationtherapy.com), over the phone, from your completed forms and in person and online during our meetings

### **How I Store Your Personal Information**

I will store your personal information both electronically and physically. Personal information is stored electronically on devices that are password and/or fingerprint I.D. protected, and in files that are further password protected and only accessible by me.

Names and contact details are stored separately to other personal information (anonymised format). Information is stored physically using paper records held securely in a locked file cabinet. These records are also only accessible by me.

According to the GDPR, your personal information should be stored for no longer than is necessary. In practical terms, I will usually store your information for a minimum of 2 years following the termination of your treatment. However, I may need to store your information for longer than this, for instance to comply with my insurance terms and conditions.

Before committing to provide you with therapy services, I will ask you over the telephone to provide me with the following information: name, telephone number, email, availability, the issues that you would like to address, and symptoms.

Once we have agreed that therapy with me is right for you, and your therapy commences, I will collect further information from you that may include what you want to achieve from therapy, your G.P. contact details, previous therapy/ies and results, current medication, health and physical symptoms, health history, financial and employment circumstances, network of support,

habits and addictions, family structure, overview of your family situation, and early memories of caregivers.

### **Special Category Information**

GDPR describes Special Category Information as being information that is more sensitive than other personal information, and therefore requiring of higher levels of protection. Examples of this type of information could include information about your health, race, sexuality, sex life, or religion. With this in mind, the condition of article 9, GDPR that I apply to the processing of your special category information, is that it is 'pursuant to contract with a health professional'. This means that, if you begin therapy with me, or ask me to assess whether or not you are eligible for me to offer therapy to you, then I will likely need to process some special category information about you. Usually, this is information about your mental and physical health, but may include data about philosophical beliefs, sex life or sexual orientation, and I need to process it in order to fulfil my contractual obligations to you in delivering safe, effective therapy.

### **Data Control**

The GDPR defines a 'data controller' as the person in an organisation who 'determines the purposes and means of processing personal data'. For the purposes of the GDPR, the 'data controller' is me, Emily Grace, Grace Transformation Therapy, Bishops Waltham SO32 1BE.

### **Sharing of Your Personal Information**

Some of your personal information may be shared with your G.P., or another healthcare professional, under certain exceptional circumstances. These include the requirements of a court of law or the threat of serious physical harm to you or to others.

Some of your personal information such as website visits, telephone call data, or payment information, is shared with the website provider, mobile phone operator, or card payment provider respectively. These providers operate under their own privacy policies.

The DPA gives you the right to find out what information that I store about you by requesting a copy of it. Any request that you make to obtain a copy of the personal information that I hold about you is called a 'Subject Access Request'. You can write to me and ask for a copy of the information that I hold about you.

### **Right to Erasure**

You can request for your personal information to be deleted either verbally, or in writing. In exceptional circumstances, I have the right to refuse to comply with your request, for example in order to defend myself in a claim situation, or to comply with my insurance terms and conditions, and I will let you know my response to your request within one month of receiving it.

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