

## **Privacy Notice**

#### 1. Introduction

Your privacy is a high priority. We are committed to take good care of your personal information and it will be kept safe and secure and will only be used for the purpose it was given. We adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR) and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

This privacy notice tells you what we will do with your personal information from initial point of contact through to after counselling has ended, including:

- Why we are able to process your information and what purpose we are processing for
- Whether you have to provide it
- How long we store it
- Whether there are other recipients of your personal information
- Whether we intend to transfer it to another country
- Whether we do automated decision-making or profiling
- Your data protection rights

We are happy to chat through any questions you might have about our data protection policy, and you can contact us by email sean@summitcounselling.org

'Data controller' is the term used to describe the person/ organisation that collects and stores and has responsibility for people's personal data. In this instance, the data controller is your counsellor. I am registered with the Data Protection Commission. My postal address is Suite 17, The Cubes Offices, Beacon South Quarter, Sandyford, Dublin 18, D18, my phone number is: 089 604 9029. My email address is: sean@summitcounselling.org

### 2. Our lawful basis for holding and using your information

The GDPR states that we must have a lawful basis for processing your personal data. There are different lawful bases depending on the stage at which we are processing your data. we have explained these below:

If you have had counselling and it has now ended, we will use legitimate interest as our lawful basis for holding and using your personal information.

If you are currently having counselling or if you are in contact with us to consider counselling, we will process your personal data where it is necessary for the performance of our contract.

The GDPR also makes sure that I look after any sensitive personal information that you may disclose to me appropriately. This type of information is called 'special category personal information'. The lawful basis for me processing any special categories of personal information is that it is for provision of health treatment (in this case counselling) and necessary for a contract with a health professional (in this case, a contract between your counsellor and you).

# How we use this information

#### Example

When you contact me with an enquiry about counselling services, I will collect information to help me satisfy your enquiry. This will include name, email address, contact number and any information you choose to share.





If you decide not to proceed, I will ensure all your personal data is deleted within **28 days**. If you would like me to delete this information sooner, just let me know.

While you are accessing counselling. Rest assured that everything you discuss with me is confidential. That confidentiality will only be broken if you pose a significant risk to yourself or others, a child is at serious risk of harm or neglect and if you disclose an illegal activity where not to disclose would break the law. Your counsellor will always try to speak to you about this first, unless there are safeguarding issues that prevent this. Your counsellor will keep a record of your personal details to help the counselling services run smoothly. These details are kept securely and are encrypted electronically and are not shared with any third party.

Your counsellor will keep written notes of each session, these notes are anonymised and encrypted electronically separate from your contact information.

After counselling has ended. Once counselling has ended your records will be kept for 6 years from the end of our contact with each other and are then securely destroyed. If you want me to delete your information sooner than this, please tell me.

I sometimes share personal data with third parties, for example, where I have contracted with a supplier to carry out specific tasks. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them. I ensure that they do not use your information in any way other than the task for which they have been contracted.

#### Your rights

We try to be as open as I can be in terms of giving people access to their personal information. You have a right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have a right to ask for a copy of any information that I hold about you and to object to the use of your personal data in some circumstances. You can read more about your rights at Data Protection Commission, 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland.

If I do hold information about you, I will:

- give you a description of it and where it came from;
- tell you why I am holding its, tell you how long I will store your data and how I made this decision;
- tell you who it could be disclosed to;
- let you have a copy of the information in an intelligible form.

You can also ask me at any time to correct any mistakes there may be in the personal information I hold about you. To make a request for any personal information I may hold about you, please put the request in writing addressing it to sean@summitcounselling.org. If you have any complaint about how I handle your personal data, please do not hesitate to get in touch with me by writing or emailing to the contact details given above. We would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way I have processed your personal information you can contact the data protection commission which is the statutory body that oversees data protection law in Ireland. For more information go to <a href="https://www.dataprotection.ie">www.dataprotection.ie</a>





# **Data Security**

I take the security of the data I hold about you very seriously and as such I take every effort to make sure it is kept secure. I anonymise your date with a specific identifier and use an encrypted device to store your personal information and counselling information separately and securely.

# Visitors to my website

When someone visits my website, I use a third-party service, [Google Analytics] to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow [Google Analytics] to make, any attempt to find out the identities of those visiting my website. I use legitimate interests as my lawful basis for holding and using your personal information in this way when you visit my website.

I use [Google Analytics] so that I can continually improve my service to you, you can read [Google Analytics] privacy notice here [https://policies.google.com/privacy?hl=en-IE]. I use [WordPress] as the content management system for our website - find out about [https://wordpress.org/about/privacy/] and data protection. Like most websites we use cookies to help the site work more efficiently - find out about our use of cookies.

[https://www.wpbeginner.com/beginners-guide/how-to-know-if-your-wordpress-website-uses-cookies/]. No user-specific data is collected by me or any third party. If you fill in a form on my website, that data will be temporarily stored on the web host before being sent to me.

