

Susan Holden Smith Privacy Policy

My website does not use cookies. However my website host, Prohost Gold collects general information about the website visits. It shows me three things:

1. How many visits there are to my website.
2. How they found my website for example Google or counselling directory etc.
3. The place of origin of the visitors.

This information does not identify the individual.

I use your email address or phone number to contact you and will retain this whilst we are in correspondence and then it is deleted as confidential waste.

I do not use your information for marketing or share with third parties unless I am required to by law. I will contact another professional if your life or someone else's life is in danger.

I keep your personal data in a locked filing cabinet ie your name, address, contact number and GP's name and address. I also keep a log of your appointments and minimal notes of content. These will include any medications you are taking.

Sue Holden Smith will only use your personal details in the service of delivering the therapy we agree to. Within the fields of Psychotherapy there are very limited grounds for sharing your personal data as outlined below:

Legitimate interest

1. If I become aware of an issue around serious risk to yourself or others, safeguarding reasons, drug trafficking or money laundering or acts of terrorism I will breach our confidentiality agreement. Your personal data will only be shared with other professionals such as those other health professionals, law enforcement agencies and /or emergency services.
2. If I become incapacitated or in the event of my death another nominated person will contact you in order to inform you and help with your transition to another service.

Legal obligation

1. I am legally required to share information in your notes if I am issued with a court order.
2. I make factual notes of our sessions in line with my professional insurance and recommendations from my professional bodies.

Data retention schedule

1. If we agree not to continue after the initial assessment your notes will be destroyed within two weeks. They will be treated as confidential waste and disposed of.
2. When our therapy is finished, in line with BACP guidelines, I keep client notes for three years. These notes are anonymised. I also keep your name and a code number.

Both sets of personal data are kept securely and separately. After this time all information is confidentially destroyed.

Your rights under the GDPR

1. You have the right to be informed.
2. You have the right to access information I hold about you.
3. Rights of rectification (if we disagree about any correction I have the right to include a note of the objections).
4. Right to erasure. This is not an absolute right and there are limitations: To comply with a legal obligation or in the public interest, or the exercise of official authority

For public health interests

1. To exercise the right of freedom of expression and information.
2. In the exercise or defence of a legal claim or complaint.
3. Right to automated decisions.

If you have any concerns about how I use or handle your personal data please discuss with me in session by email or telephone.

*This privacy statement is subject to review.
June 5 2018*