

# **Privacy Policy**

Last Updated: 30 September 2025

#### 1. Introduction

This Privacy Policy explains how I, Karen Cunliffe, trading as Balanced Wellbeing Therapy, collect, use, store, and protect your personal information.

I am committed to protecting your privacy and confidentiality. As your counsellor, I am the 'Data Controller' of your personal data, which means I am responsible for keeping your information safe and using it in a fair and lawful way.

Please read this policy carefully. By engaging in my counselling services, you are confirming that you have read and understood this policy.

My contact details are:

• Name: Karen Cunliffe

Address: Haere-mai, London Road, Ryarsh, Kent ME19 5AJ

• **Phone Number:** 07775 594268

• Email Address: info@balancedwellbeingtherapy.co.uk

• Website: www.balancedwellbeingtherapy.co.uk

I am registered with the Information Commissioner's Office (ICO), the UK's data protection regulator. My registration number is **ZC005044** 

# 2. What Information I Collect (Your Personal Data)

I may collect the following information from you:

- **Personal Information:** Your full name, date of birth, gender identity, and contact details (including address, email, and phone number).
- **Emergency Contact Information:** The name and contact details of someone you nominate for me to contact in case of an emergency.
- **GP Details:** The name and address of your GP surgery.
- Special Category (Sensitive) Data: Information you share during our sessions. This
  includes handwritten notes I take during our sessions, which may contain details about your
  physical and mental health, personal life, relationships, and any other information you
  choose to disclose. These notes are for the sole purpose of providing you with the best
  possible therapeutic support.
- Financial Information: Details of payments you have made to me for services.
- Correspondence: Records of our communications, including emails and text messages.



# 3. My Lawful Basis for Processing Your Data

The UK GDPR requires me to have a lawful basis for processing your data. The bases I use are:

Type of Data	Purpose of Processing	Lawful Basis
Personal & Contact Details, GP & Emergency Contact	To manage and schedule your appointments, communicate with you, and contact your nominated person or medical professional in a genuine emergency.	Contract: Processing is necessary for the performance of our counselling contract.
Session Notes (Special Category Health Data)	To provide you with a safe and effective counselling service and to maintain a professional record of our work together.	Explicit Consent: At the start of our work, I will ask for your explicit consent to process this sensitive data. Legitimate Interest: It is in my legitimate interest as a professional therapist to keep records to ensure the quality and continuity of care.
Financial Data	To process payments for my services and for my own tax and accounting purposes.	Contract & Legal Obligation: Necessary for our contract and for me to comply with tax law.
Information regarding risk of harm to self or others	To comply with my safeguarding duties and professional ethical framework.	Vital Interests & Legal Obligation: Processing is necessary to protect someone's life or to comply with my legal and ethical obligations.

#### 4. How I Store Your Information

I take the security of your data very seriously.

- **Handwritten Notes:** All handwritten clinical notes are kept in a securely locked filing cabinet at my practice address. They are identified by a client code, not by your name.
- **Digital Information:** Your name, contact details, and appointment information are stored on a password-protected and encrypted computer/device. Emails and text messages are stored on secure servers by the relevant providers.
- **Anonymisation:** Wherever possible, I will use a client code to anonymise your data, separating your personal contact details from your session notes.



### **5. Sharing Your Information**

Your confidentiality is paramount. I will not share your personal data with any third parties except in the following specific circumstances:

- Clinical Supervision: As a requirement of my professional body ([Your Professional Body, e.g., BACP]), I attend regular clinical supervision. I will discuss my work with my supervisor to ensure I am practicing safely and ethically. In these discussions, I will refer to you only by your first name or a code to protect your identity. My supervisor is also bound by strict confidentiality agreements.
- Risk of Serious Harm: If I have reason to believe that you or someone else is at risk of serious harm, I have a professional and ethical duty to break confidentiality and contact the relevant authorities (such as your GP, the emergency services, or social services). I will always try to discuss this with you first, unless doing so would increase the risk of harm.
- **Legal Obligation:** I may be required to disclose your information if I am ordered to do so by a court of law.
- Incapacitation: In the event of my death or sudden illness, a trusted colleague (my 'Therapeutic Executor') will have access to your contact details to inform you of the situation. They will not have access to your session notes.

I will never sell your data or use it for marketing purposes without your explicit consent.

#### 6. Data Retention

I am required by my professional liability insurer to keep client records for a specific period after our work has ended.

- I will retain your session notes and personal details for **7 years** following the end of our counselling relationship.
- After this period, all data will be securely destroyed. Digital files will be permanently deleted, and paper files will be confidentially shredded.

### 7. Your Data Protection Rights

Under data protection law, you have several rights regarding your personal data:

- Your right of access: You have the right to ask for a copy of the information I hold about you. This is known as a Subject Access Request.
- Your right to rectification: You have the right to ask me to correct any information you believe is inaccurate.
- Your right to erasure: You have the right to ask me to erase your personal information in certain circumstances. Please note that for legal and insurance purposes, I may not be able to erase your session notes until the retention period has passed.
- Your right to restriction of processing: You have the right to ask me to restrict the processing of your information in certain circumstances.



- Your right to object to processing: You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability: You have the right to ask that I transfer the information you gave me to another organisation, or to you, in certain circumstances.

To exercise any of these rights, please contact me at balancedwellbeingtherapy@gmail.com. I will respond to your request within one month.

### 8. How to Complain

If you have any concerns about my use of your personal information, please contact me directly in the first instance so we can try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office (ICO) if you are unhappy with how I have used your data.

The ICO's details are:

 Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113Website: <a href="https://www.ico.org.uk">https://www.ico.org.uk</a>

## 9. Changes to This Privacy Policy

This policy may be updated from time to time. The latest version will always be available on my website, or I can provide you with a copy upon request.

#### **Data Protection**

I am registered with The Information Commissioners Office in the UK and undertake to comply with the Data Protection Act and regulations in all our dealings with your personal data. Your personal information will be kept secure.

The latest privacy notice is always available on our website <a href="www.balancedwellbeingtherapy.co.uk">www.balancedwellbeingtherapy.co.uk</a>. It explains how we use and look after your personal data, who we share it with, and what data protection rights you have. We can post you a copy of our privacy notice if required.