



Counselling & Psychotherapy

AMN Counselling & Psychotherapy  
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## **AMN COUNSELLING & PSYCHOTHERAPY – PRIVACY POLICY**

All your information is managed appropriately regarding confidentiality. I am registered with the Information Commissioner's Office (ICO) Registration Number ZB 343300.

My Privacy Policy complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Here I explain what information I collect, how I use it, and your rights to accessing or erasing this data.

'I', 'me', and 'my' refers to Angela Naylr, Counsellor and Psychotherapist at AMN Counselling & Psychotherapy. I am the Data Controller with sole responsibility for processing data collected by AMN Counselling & Psychotherapy.

'You' and 'yours' refers to the Data Subject ie. the counselling client of Angela Naylor.

### **1. The information I collect, how and why:**

- i. Contact details: names, address and contact details, together with your preferred acceptable contact methods, your nominated emergency contact and details of your GP surgery in case of emergency. This is so that I can contact you between sessions if required. I ask for emergency contact/GP details to ensure that, should the need arise, I can contact the relevant parties concerned.
- ii. Brief process notes: my process notes support continuity of care, professional reflection, supervision, insurance requirements, and the safe delivery of counselling services. These notes are not intended to be a detailed record or transcript of therapy sessions and are maintained solely for professional purposes and my own supervision.
- iii. Administrative and service information: this may include completed forms, signed agreements, emails, texts, and other administrative correspondence required to provide counselling services.
- iv. Personal information is stored securely, and access is restricted to the extent necessary for the operation of my practice.

### **2. Lawful Basis for Processing:**

The lawful bases I rely upon may include:

- Contract – where processing is necessary to provide counselling services and administer our therapeutic relationship.
- Legal Obligation – where processing is necessary to comply with legal, regulatory, safeguarding, tax, or insurance requirements.
- Legitimate Interests – where processing is necessary for the safe and effective administration of my practice, including professional supervision and record keeping.
- Explicit Consent – where consent is required for the processing of certain categories of personal information.

Where I process special category personal data, such as information relating to your health, I do so only where permitted under UK data protection legislation.

3. **Who I will share this information with:**

Personal information will not normally be shared with third parties without your knowledge or prior consent. Information may be shared where required by law, where necessary to protect your safety, or as part of my professional and regulatory obligations. Personal information may also be accessible to service providers who support the operation of my practice, such as banking, accounting, email hosting, and other administrative services, where necessary for the administration of my practice.

4. **How long I keep your information:**

Client records including contact details, emergency contact/GP details, relevant medical information that you choose to provide, signed agreements, emails, texts, WhatsApp messages, resources, exercises and other materials shared as part of our work together, and brief process notes, are normally retained for six years following the end of our therapeutic relationship.

5. **Accessing and porting your data:**

At any time, you may request a copy of the information I hold about you. This should be made in writing, or by email. I will normally respond to your request within one month of receiving your request. There is no charge for this.

6. **Revoking your consent:**

Where I rely on your consent to process personal information, you have the right to withdraw consent at any time by contacting me in writing, or by email. Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn. In some circumstances, I may be required to retain information where there is a legal, regulatory, safeguarding, insurance, or professional obligation to do so.

7. **Right to erasure:**

You have the right to request that your personal information be deleted. Requests should be made in writing, or by email. The right is not absolute, and there may be circumstances where I am unable to delete information, including but not limited to situations where I am required to retain information to comply with legal, regulatory, safeguarding, insurance, or professional obligations, or where the information is required in connection with actual, or potential legal claims.

8. **Data breaches:**

In the unlikely event of a security incident affecting the confidentiality, integrity, or availability of your personal information, whether caused deliberately or accidentally, I will assess the incident and take appropriate action. Where required by law, I will report the breach to the Information Commissioner's Office (ICO) within applicable timescales. If the breach is likely to result in a high risk to your rights and freedoms, I will also inform you without undue delay.

9. **Your right to complain:**

You have the right to complain to the Information Commissioner's Office (ICO) if you believe your personal information has been handled improperly. Further information about making a complain can be found on the ICO website.