

# ACEY COUNSELLING

## Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

### Contact details

Email - [fiona@aceycounselling.co.uk](mailto:fiona@aceycounselling.co.uk)

### What information we collect, use and why

We collect or use the following information for **service updates or marketing purposes**:

- Name, address and contact details

We also collect the following special category information for **service updates or marketing purposes**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information **to provide patient care, services, pharmaceutical products and other goods**:

- Name, address and contact details
- Date of birth
- Emergency contact details
- Health information (including medical conditions, allergies, medical requirements and medical history)

- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)

We also collect the following special category information **to provide patient care, services, pharmaceutical products and other goods**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following information **for safeguarding or public protection reasons**:

- Name, address and contact details
- Emergency contact details
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)

We also collect the following special category information **for safeguarding or public protection reasons**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information **to comply with legal requirements**:

- Name
- Contact information
- Safeguarding information
- Financial transaction information
- Psychotherapy notes
- Any other information to comply with legal obligations

We also collect the following special category information **to comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Correspondence
- Financial transaction information
- Purchase or service history
- Relevant information from previous investigations

## Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR.

You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **to provide patient care, services, pharmaceutical products and other goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information **for safeguarding or public protection reasons** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information to **comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

## **Where we get personal information from**

- Directly from you
- Family members or carers
- Other health and care providers
- Insurance companies

## **How long we keep information**

Any email contact is deleted from email servers within 4 weeks following receipt of the email contact.

Where psychotherapy notes are made and contracts signed these records will be stored manually, and kept in a secure locked cabinet for 5 years following the termination of treatment.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

## **Who we share information with**

### **Others we share personal information with**

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Relevant regulatory authorities
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Organisations we are legally obliged to share personal information with

## Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the Public Benefit and Privacy Panel for Health and Social Care or other similar governance and scrutiny process.

## Sharing information outside the UK

Where necessary, we transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

**Organisation name:** Google LLC

**Category of recipient:** Email provider

**Country the personal information is sent to:** USA

Google complies with UK data protection law (UK GDPR and Data Protection Act 2018) through several key technical and legal safeguards. Key compliance components include: International Data Transfers: If your data is transferred to servers outside the UK or the European Economic Area (EEA), Google relies on the UK-US Data Bridge (Data Privacy Framework) for the US and Standard Contractual Clauses (SCCs) for other global regions to ensure adequate protection. Data Processing Agreements (DPA): By using Gmail, you enter into Google's Online Services Terms (OST). These act as a legally binding DPA, committing Google to act only on your instructions and assist with data subject rights.

## How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

**Email:** [fiona@aceycounselling.co.uk](mailto:fiona@aceycounselling.co.uk)

We will acknowledge your complaint within 30 days and investigate without undue delay.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

### **The ICO's address:**

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>