



Privacy Statement

This privacy statement outlines my obligations (Lena Zagel) as a therapist under including the General Data Protection Regulation (EU/2016/679) (the GDPR), the General Data Protection Regulations (May 2018), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and your rights as a client. It is concerned with the personal information about you that I collect, store and share. I am registered with the Information Commissioners Office (ICO) as a data controller www.ico.org.uk. Information Commissioner's Office Reg. Number [ZB902921].

Data controller' is the term used to describe the person/ organisation that collects and stores and has responsibility for people's personal data.

Postal address:

Brightspot Counselling

Carlton House

68 Conwy Road

Colwyn Bay

LL29 7LD

Phone number: (+44)7958 495401

Email: brightspotcounselling@gmail.com

What personal information do I collect from you?

- Name and date of birth
- Telephone/SMS number (plus permission to send SMS & leave voice message)
- Email address (work or personal)
- Preferred method of contact
- GP details, prescribed medication & GP awareness of seeking
- Any other treatments
- Referral route and keyword search

How is this information stored?

- *Phone* numbers and texts are stored in my work phone under first names only.
- *Email* addresses and correspondence will be stored in my email account when you contact me. They are protected by the in-built software security systems and with my own individual password protection.
- *Microsoft Teams and Zoom* keep a record of your profile on my computer which is password encrypted
- *Paper format* documents (e.g. written notes of each session) are stored in a locked cabinet away at my place of work. Your contact form is kept locked separately from other written information which is coded. Any documents generated on my computer (e.g. GP letter, invoice etc.) are protected by the in-built software security systems and with my own individual password protection.
- *Bank details:* BACS payments will appear on my bank records with your chosen reference and may be audited by HMRC



Confidentiality

The confidentiality of the relationship between client and therapist is most important and you can be rest assured that everything you share with me, from the point of initially contacting me will be kept confidential.

However there are specific instances when I may have to break confidentiality and share with a third party as stated within the BACP ethical framework and are listed below:

- When there is a danger of harm to self or others/ a serious risk of harm to self or others
- When a court order is issued requiring information to a judge
- When there is a disclosure of harm/risk to a child or vulnerable adult
- When there is disclosure of involvement/planning of terroristic acts, serious crimes, money laundering

I will always inform you of my concerns and would try speaking to you beforehand, however there are occurrences where this may not be possible due to safeguarding concerns. And I might then have to disclose information to the relevant authorities.

How might I need to share your personal Information?

Supervision

As part of my professional obligations I attend monthly consultations with a supervisor. In order to protect your privacy, my supervisor will not know you personally or professionally. I will refer to you by your first name, and I may refer to some of the content of your sessions verbally when it's helpful to my professional processes.

Therapeutic Will

In the unlikely event of my sudden death, illness, or circumstances leaving me unable to work, your name and contact details will be shared with a trusted colleague. They are authorised by me to contact you and ensure you are informed about my situation and offered alternative options where appropriate.

Emergencies

If there is any risk to your health, (provided, where possible, I have your consent) I may share your contact information with an emergency healthcare service (e.g. a GP or Mental Health Crisis Team or Emergency Services). I will always talk with you about this first (when I would have to break confidentiality) unless there are safeguarding issues that prevent this. If I have become aware of your intent to cause harm to another person/organisation (e.g. terrorism), the law may require that I inform an authority without seeking your permission and share your personal information without your knowledge.

Erasing your information

I erase text messages and emails on a regular basis. If there is therapeutic content, I will erase this information when we have finished working together. I will retain any written information for up to 7 years past the end of our work in line with my professional standards guidance (www.bacp.co.uk). This accords with standard industry practice and ensures I have a reference



of our work in situations such as you returning to counselling in the future. After this time has passed, I will shred the written information.

What are your rights?

- To be informed about what information I hold about you and how it is stored or used (outlined in this document)
- To withdraw consent to me using or storing your personal information and/or request that I erase such information (although I can decline whilst the information is needed for me to practice lawfully & competently)
- To be informed about who your information could be disclosed to (outlined in this document)
- To request any corrections in personal information I hold about you
- To make a written data subject access request to be informed about the personal information I hold
- To be informed of any data breach which may compromise your confidentiality

You can read more about your rights at ico.org.uk/your-data-matters. To make a request for any personal information I may hold about you, please put the request in writing addressing it to brightspotcounselling@gmail.com.

What if something goes wrong?

In the unlikely event of any data breach (digital or paper records) I will contact the ICO and assess the risk to you of any loss of confidentiality. When necessary, I will make you aware of the breach and any implications for your reputation, economic, social, or financial safety.

If you have a complaint about how I processed your personal data, please do not hesitate to contact me by writing to the contact details given above. I would welcome any suggestions for improving my data protection procedures. If you want to make a formal complaint about the way I have overseen your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK.

For more information go to ico.org.uk/make-a-complaint. Information Commissioner's Office | Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Helpline number: 0303 123 1113 | ICO website: <https://www.ico.org.uk>

Additional information for visitors to my website

This website www.brightspotcounselling.com is hosted by *Webhealer* which is encrypted and holds a current SSL Certificate does not share any information collected with any third parties. The information you provide through the website (email, phone number, name, and message) via the online form is sent directly to my encrypted email system and will be deleted from their system after it was received.



When someone visits my website, I use a third-party service, *Google Search Console* to collect standard internet log information and details of visitor behaviour patterns so that I can continually improve my service to you. I do this to find out things such as the number of visitors to the various parts of the site. This information is managed in a way, which does not identify anyone. I do not make, and do not allow *Google Search Console* or *Webhealer* 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.

You can read *Google Search Console* privacy notice here [[Privacy Policy – Privacy & Terms – Google](#)] and *Webhealer* privacy here [Privacy Policy - WebHealer | Therapist Websites. 20 Years Experience](#)

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