

# Data Protection & Privacy Policy

## Who we are and what we do

Our name is Embrace Psychological Services. We offer clinical psychology services from a HCPC-Registered (Health and Care Professions Council) and BPS-Chartered (British Psychological Society) Clinical Psychologist. We also offer Cognitive Analytic Therapy services from an ACAT-accredited (Association of Cognitive Analytic Therapy) Cognitive Analytic Therapy practitioner.

## My commitment

Although we may need to collect and hold certain personal data in order to deliver our services to you we are committed to protecting and respecting your privacy. This policy provides an overview of how we comply with data protection legislation and the basis on which any personal data we collect from you, or that you provide to us, will be processed.

## How we obtain personal information

If you contact us, whether by telephone, email, website, or other means, we may keep a record of that correspondence. We may ask you to complete various questionnaires and other forms that we will use to tailor our services to your needs. We may keep records of any meetings and sessions in the form of written notes, electronic notes and audio recordings. We may receive correspondence from you or from other individuals or organisations relating to the services we deliver to you. We may also produce notes, assessments or reports.

## What personal information we collect and how we use it

The information we may hold on you falls into the following categories.

### Contact information

We hold contact information that you have provided to us and which we use to contact you about the delivery of services. This information may include:

- Your full name,
- Your telephone number(s),
- Your email address, and
- Your postal address.

### General information

We hold general information that you have provided to us and which we use to manage the delivery of services to you. Some of this information also enables us to comply with our legal or regulatory obligations. This information may include:

- Your full name, including title,
- Your date of birth,
- Contact details for your GP,
- Your signature on documents,

- General correspondence relating to the services we provide to you,
- The dates and times of appointments, and
- Reference details where you have been referred by a third party, such as an insurance company.

### **Mobile communications**

Some of our contact may take place via mobile communications systems such as mobile phone messaging or iMessage. We may need to hold some of your personal data to facilitate these contacts. Some information is also stored by the service providers. This information may include:

- Your first name and the initial of your surname,
- Your telephone number(s),
- Text messages,
- Voicemail messages, and
- Meta data.

Service providers generally do not record the messages that are exchanged but they do store what is called “Meta Data”. This is service data, such as who was contacted and how long the call was for.

### **Familial relationships**

If we require consent from a parent or guardian to deliver services to you, or if a family member, guardian, or other agreed person is directly involved in your case, then we may need to hold contact and general information about those individuals.

### **Sensitive information**

Due to the nature of our services we may need to process data relating to your physical and mental health. The General Data Protection Regulations deem data concerning health as a special category of personal data which means that we need specific reasons for processing this data. These reasons relate to the type of services that we deliver to you. We may also need to hold some of this information in case there is a legal query. The information we hold may include:

- Health information,
- Details of any medication you may be taking,
- Details of other clinicians involved in your case,
- Legal case details (where applicable),
- Diagnostic questions and answers,
- Sensitive correspondence relating to your case, and
- Detailed treatment information.

### **Financial records**

We are required by law to hold information on payments received for our financial records. This information may include:

- Your full name,
- The dates and amounts of payments, and
- Details relating to third parties if they are paying for your treatment.

## **Notification data**

We need to hold some information so that we can inform you in the event of a breach of your personal data. Unless you specifically ask us not to, we will hold this information for as long as we hold any other personal data about you. This information may include:

- Your full name,
- Your postal address, and
- Your email address.

If this information changes, please let us know as otherwise we would not be able to contact you if we needed to do so.

## Who we share your data with

We may share your Personal Data with selected third parties that help us to deliver our services. We will never share your Special Category Data with these organisations.

We may share your Special Category Data with other professionals or organisations involved in your case, but we will make sure you are aware of this.

Each of our practitioners undergoes regular formal supervision. As part of these sessions it may be necessary to discuss your personal data, including special categories of personal data, with the supervisor who will be a qualified professional operating under terms of confidentiality. We will not share with a supervisor any personal data that could be used to directly identify you.

## Data retention and destruction

We do not keep information about you any longer than is necessary. The length of time we keep your data may be determined by statutory or regulatory requirements. We delete or destroy all personal data when it is no longer required.

A copy of our data retention policy is available to clients on request. This shows how long we would expect to keep your data and why.

## Your rights under data protection legislation

You have various rights under the relevant data protection legislation. If you wish to exercise any of these rights, then please contact us in writing (see 'How to contact us' below).

We are confident that we will be able to answer any questions you may have, but should you feel it is necessary you do have the right to contact the UK Information Commissioner's Office to discuss the matter further.

### **Subject Access**

You have the right to see what personal data we hold about you. You also have the right to know where we got the data from, how and why we are processing your data, who it has been shared with, and how long we intend to keep it for.

### **Rectification**

You have the right to ask us to investigate, and correct where appropriate, any personal data we hold about you that you believe is wrong.

## **Erasure**

You have the right to ask us to erase personal data that we hold about you where we no longer have a lawful purpose to process the data, or where the data is being processed based on your consent which has now been withdrawn.

This right may be restricted by our need to comply with laws, regulations or other legitimate reasons that require us to retain data. However, we will tell you if this is the case.

## **Restriction of Processing**

You have the right to ask us to restrict the processing of your personal data. Restricted processing means that we cannot make any changes to the data unless we have your consent. You can ask for restricted processing where:

- You believe the data we hold is inaccurate and we need time to properly investigate,
- We have unintentionally come into possession of your personal data that we should not hold but you do not want us to delete it,
- Where we no longer need your personal data, but you want us to hold on to it for legal reasons, or
- Where you have objected to how we use your personal data, and this is being investigated.

Once your treatment ends we will automatically restrict the processing of any personal data that we need to keep.

## **Right to Object**

Where you feel that we are processing your personal data in a way that is inappropriate you have the right to object and so ask us to demonstrate legitimate grounds for doing so. This includes asking us not to communicate with you other than in ways you choose.

## **How to contact us**

If you would like any further information, or you would like to exercise any of your data protection rights, please get in touch.

By post, at:

Embrace Psychological Services,  
Weaver Business Centre,  
Winnington Avenue,  
Winnington,  
Cheshire,  
CW8 4EE

Or by email, at: [contact@embrace-psych.co.uk](mailto:contact@embrace-psych.co.uk)