



## Positive People Partnerships Customer Privacy Notice

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

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### **Contact details**

Telephone: **07450 347910**

Email: **counselling@jlhooper.co.uk**

### **What information I collect, use, and why**

I collect or use the following personal information to enable me to identify you and your needs.

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

I collect or use brief notes, following each session, to provide a reminder of what was discussed at the counselling sessions. You can access these notes at any time, by asking me. This information is handwritten and not entered onto any computer and is locked away at all times.

If you prefer, I did not make these notes, please inform me at the initial session.

### **Lawful bases and data protection rights**

Under UK data protection law, I 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 bases I 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 me for copies of your personal information. You can request other information such as details about where I get personal information from and who I 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 me 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 me to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask me to limit how I 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 I transfer the personal information you gave me to another

organisation, or to you. [Read more about the right to data portability.](#)

- **Your right to withdraw consent** – When I use consent as my 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, I must respond to you without undue delay and in any event within one month.

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

### **The lawful basis for the collection and use of your data**

My lawful basis for collecting or using personal information is to provide a reminder of what was discussed at the counselling session is:

- Legitimate interests – I am collecting or using your information because it benefits you, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. My legitimate interests are:
  - At counselling and psychotherapy sessions, I collect the GP details so that in the event that a client is at serious risk of becoming unwell, I have a contact point. This is discussed with you, the client, at the first session.

For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

My lawful bases for collecting or using personal information are:

**Consent** - I have permission from you after I 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.

**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 maintaining 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 (where appropriate)

### **How long we keep information**

7 years. If you would rather I did not keep notes, I will respect that and not make any written notes. This will be discussed at the first session.

If you want me to delete your information sooner than this, please tell me.

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

### **Duty of confidentiality**

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

- You have provided me with your consent (I have taken it as implied to provide you with care, or you have given it explicitly for other uses)
- I 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.

## How to complain

If you have any concerns about my use of your personal data, you can make a complaint to me using the contact details at the top of this privacy notice.

If you remain unhappy with how I have used your data, after raising a complaint with me, 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>