



This is the data privacy statement of Salopian Psychology provided by Dr Estelle McDougall. It explains how Salopian Psychology looks after client's personal data and privacy within the General Data Protection Regulation (GDPR) and related rules. By providing personal data, the client acknowledges that we will only use it in accordance with this Privacy Statement. It is assumed that by contacting us and/or further engaging with the contracted service that the clients are consenting to this privacy statement.

Data protection laws require that the personal data held about you must be used lawfully, fairly and in a transparent way; collected only for valid purposes that have been clearly explained to you and not in a way that is incompatible with those purposes; relevant to the purposes we have told you about and limited only to those purposes; accurate and kept up to date; kept secure and confidential and kept only as long as necessary for the purposes you have been told about.

1. Confidentiality

- 1.1 Documentation: Any documentation disclosed by each party to the other during the period of this agreement (including, without limitation, confidential information) shall be regarded as between the parties, and as the property of the disclosing party. It shall be used solely and exclusively for the purposes of this agreement and for no other purpose whatsoever.
Neither party shall disclose any such confidential information to any third party other than employees, agents or assistants duly appointed in accordance with this agreement for the proper performance of their duties.
Confidentiality as outlined above will be abided to by both parties, except situations outlined in 'limitations of confidentiality' below, or for which you have given consent.
- 1.2 Online psychological therapy: During video call appointments, I will be in a private space where you cannot be overheard or seen by another party. This is also expected from the client to ensure privacy and confidentiality for both parties. Video platforms offer a degree of security and encryption, it is not possible to guarantee how companies providing these services handle data. For some platforms, it might mean that the client number and call is logged on my device. I do not store numbers in my digital address book, but the operating system may recognise the number and link it to email exchanges.
- 1.3 Recording psychological therapy: Recording of therapeutic sessions will not be permitted unless otherwise agreed by both parties.

2. Limits of Confidentiality

- 2.1 Clinical Supervision: I attend regular supervision with a qualified Clinical Psychologist to ensure I am offering a reflective and good quality service. I follow best practice guidelines set out in British Psychological Society and will share information relating to session content with the clinical supervisor(s) for the purpose of clinical supervision only. All client identifiable information will not be disclosed. The supervisory relationship is bound by the same confidentiality policy and thus information will not be shared beyond the supervisory setting except in instances which exceed the limits of confidentiality policy as described in this document.
- 2.2 Duty to protect from harm: Where information shared by the client indicates there is a significant risk of harm to the client or any other person, or where it is required by law, I have a duty to disclose this information to the appropriate authorities, the confidentiality policy will be overridden by the duty to protect the client and others from harm.



- 2.3 To collect unpaid fees: Where fees have remained unpaid for a period of time, contact details and details of missed appointments and payments may be shared with third parties. Where this occurs, the client will be informed in advance.

3. Personal information and data

- 3.1 Data collection: upon initial contact, the client will be asked to provide details such as, name, telephone number and email. The contact form also requires the client to include a reason for Salopian Psychology input request. This is to determine whether the service is in a position it may be able to help and to determine recommendations for the course of action thereafter.
- 3.2 Use of personal data: Salopian Psychology will use client personal data to fulfil their instructions and requirements and will ask only for data that is adequate, relevant and not excessive for those purposes. Where we send clients information for any purpose, it will be sent by email. When we ask for personal data, it may be for any of the following purposes: to contact the client to inform them of our services or to send requested information.
- 3.3 Data storage: If you chose not to proceed with our service, your details will be safely deleted after 6 months; they will be kept in case you chose to re-contact our service, after a chance to consider whether or not you wish to engage our services. If you would like your details destroyed before the 6 months, please let us know (contact details on web site). Before commencing therapy, the terms and conditions will be provided, signed and returned along with personal information (including GP details and next of kin). This will be stored alongside any other documentation (e.g. client therapy notes, reports, psychometrics) for the duration of involvement with the service. These details are not shared with third parties, unless I am legally or ethically bound (see limits of confidentiality). Upon the conclusion input from our service, client data will be securely stored in an archive and kept for a maximum of 7 years, in line with GDPR, from the last appointment unless you and your therapist agree otherwise (or unless there are exceptional reasons such as those linked to legal processes). This is so that should you choose to return for a further appointment/course of therapy, if our services are still being provided, then this information can be accessed as needed. When our services cease to be provided, records will be securely destroyed (or unless there are exceptional reasons such as those linked to legal processes).
- 3.4 Client's rights regarding data: Clients have the right to: access data; have inaccuracies corrected; have information deleted; prevent marketing; have the right to complain to the ICO; be informed of data breaches without undue delay and prevent automated decision-making and profiling (N.B. the service does not do this type of processing). Note these rights are not absolute and can be overridden by other interests in extremely rare and special circumstances, e.g., court subpoenas. The right to have information deleted is also not absolute and specific circumstances must apply. The client has the right to end therapy at any point and to request no further contact. The client may request the deletion of contact details from computer records and the secure deletion of therapy file. Usually, this record of the therapy provided will continue to be kept securely and is to be shredded after 7 years. The client has the right to ask what information is kept and to change their mind about what is kept & how they are contacted. Those individuals who accept this policy have the right to



change their mind at a later date and request deletion of their contact details. They should do so by making written contact by email or post.

4. Intellectual Property

- 4.1 Any and all intellectual property rights that may arise by virtue of provision of psychological services during the period of this agreement shall belong exclusively to the Psychologist.

5. Scope of privacy policy

- 5.1 Salopian Psychology is committed to maintaining the privacy and confidentiality of information provided by you to us. The term 'personal data' is defined in the Data Protection Act 1998.

6. Notification of changes to privacy policy

- 6.1 Salopian Psychology strives to continually improving our methods of communication and adding new features to this website so if we change our data protection practices we will notify you on this page, so we encourage you to check this page frequently.

7. Anonymised data collected via this website

- 7.1 In addition to the information, we collect as described above, we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers they use. This technology does not personally identify you – it simply enables us to compile statistics about our visitors and their use of our website.
- 7.2 Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again, this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.
- 7.3 Cookies: In order to collect the anonymous data described in the preceding paragraph, we may use session 'cookies' that remain in the cookies file of your browser until the browser is closed. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. For more information about cookies, including how to set your browser to reject them, please go to www.allaboutcookies.org.
- 7.4 We may also use your IP address to help diagnose problems with our server and to administer our website. An IP address is an assigned number, similar to a telephone number that identifies your computer on a network. Your IP address is also used to gather broad demographic information.
- 7.5 We may also perform IP lookups to determine the domain you are coming from (e.g. aol.com, yourcompany.com) to gauge more accurately our users' demographics.

8. Disclosure of your personal details

- 8.1 Salopian Psychology does not disclose your personal data to other businesses who may contact you about their services that may interest you.



8.2 Salopian Psychology may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, to protect your vital interests, to protect the security or integrity of our databases or this website, to take precautions against legal liability, or in the event of a joint venture, collaboration, financing, sale, merger, reorganisation, change of legal form, dissolution or similar event.

8.3 Where appropriate, before disclosing personal data to a third party, we contractually require the third party to take adequate precautions to protect that personal data and to comply with applicable law.

9. Data access and corrections

9.1 Upon receipt of client's written request and enough information to permit us to identify personal data, we will disclose to the client the personal data we hold about you, for which we may make a charge up to the maximum as allowed by applicable law. We will also correct, amend or delete any personal data that is inaccurate and notify any third party recipients of the necessary changes.

10. Links to other websites

10.1 This website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. We do not control these websites and are not responsible for their personal data practices. We urge you to review any privacy policy posted on any site you visit before using the site or providing any personal data about yourself.

11. Governing Law

11.1 This privacy policy forms part of our website Terms of Use.