



## GDPR COMPLIANCE POLICY

- **Who am I and how I process your personal data:**

Emma Cebador Navarrete (known below as the practitioner) complies with the obligations under the General Data Protection Regulation (GDPR) by keeping personal data up to date; by storing (and destroying it) securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

- **I use your personal data for the following purposes:**

- ✓ To deliver the services you have requested;
- ✓ To contact you as necessary in accordance with the services you have requested;
- ✓ To contact you via surveys to ascertain your opinions on the service you received from me;
- ✓ To contact you with information on additional courses that may interest you;
- ✓ To maintain my own accounts and records.

Individual client data will never be passed to a third party without the express consent of the respective client, always provided that such confidentiality is neither inconsistent with the therapist's own safety or that of the client, the client's family members or other members of the public, nor in contravention of any legal action or legal requirement.

In accordance with my need to maintain the possibility of access to client data as a result of returning clients or those who may wish to lodge a complaint in respect of my professional services to either my professional body or my insurers (i.e. in all cases perhaps after a long period of time has elapsed), we retain client data for a minimum period of 7 years. For clients under the age of 18, data will be retained until their 25th birthday.

- **Lawful basis for processing client personal data**

The client has given clear consent for me to process their personal data for a specific purpose. Further, the processing is necessary for both my client's and my own legitimate interests.

- **Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- ✓ The right to request a copy of your personal data which the practitioner holds about you;
- ✓ The right to request that the practitioner corrects any personal data if it is found to be inaccurate or out of date;



*Emma Cebador - Clinical & Counselling Psychologist*

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- ✓ The right to request your personal data is erased where it is no longer necessary for the practitioner to retain such data;
- ✓ The right to withdraw your consent to the processing at any time;
- ✓ The right to request that the data controller provide the data subject with their personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [N.B. This only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- ✓ The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- ✓ The right to object to the processing of personal data, (where applicable) [N.B. This only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics]
- ✓ The right to lodge a complaint with the Information Commissioners Office. (See below).

- Complaints Notice

The client has the right to complain to the Independent Commissioner's Office (ICO) if they think there is a problem with the way we are handling their data.

- Privacy Policy

Any personal information we collect from my services will be used in accordance with the Data Protection Act 2018 and other applicable laws.