

This is the privacy notice for Turning Point Psychotherapy

I am committed to protecting and respecting the privacy of my clients. I comply with the Data Protection Act 2018, which incorporates the requirements of the General Data Protection Regulation (GDPR). The law requires me to tell you about how I collect, use, store or otherwise act on information that could identify you as an individual. This notice does that.

I am also required to tell you about your rights and my obligations to you. I do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org.

I review my privacy policy regularly. If I change how or why I process personal information, I will update this notice to ensure that it accurately reflects my policy. I will also notify you personally if any changes affect specifically how your data is processed.

About my business

I work independently in private practice offering psychodynamic psychotherapy. I practice at: 6 Lower Grosvenor Place, Westminster, London SW1W 0EN. I offer therapeutic services in person, online and by telephone.

If you have any questions about this notice or your personal information you can contact me on neetu@turningpointpsychotherapy.co.uk

Special category data

Special category data is defined by the law as information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and trade union membership. It also includes health, genetic and biometric data.

In order to work with you, I may need to know information that falls into the types classed as special category data. For example, I may need to know who your GP is, and about other healthcare professionals who work for you and about medication you are taking. By law, I am able to process special category data if you give me explicit consent. I can also process it where doing so is necessary for health or social care purposes. If I process special category data relating to you then I ensure that additional care is given in safeguarding it. For example, I consider whether I can minimise the amount I collect and whether I can anonymise it.

Using personal information to reply to your enquiry about my services

Personal information including your name and contact information is collected by me when you contact me by telephone and email. I process this information on the basis of consent where I believe it is reasonable that you would expect me to respond to your enquiry. I do not use this information for any other purpose.

Personal information used in providing my services to you

If you meet me for a one-off consultation and we both agree to start working psychotherapeutically together, then I will ask you to agree to my terms of service. While we work together, I process your personal information on the basis of contract – that you have contractually agreed for me to use it by accepting my terms.

I may collect any of the following types of information from you:

- Your name
- Contact information, which may include a postal address, an email address and your telephone number
- Special category data
- Information about payments that you have made to me
- Correspondence between us

How do I protect your personal data?

I treat your data with the utmost care and have put in place appropriate security measures to prevent it from being accidentally lost, used, accessed in an unauthorised way, altered or disclosed.

Except where mentioned in this notice, only I have access to your personal data. All electronic records are password-protected and are stored using secure, cloud-based technology. All physical records are kept in a locked storage unit. Where possible all records are anonymised and kept electronically. All website interaction is secured using “secure sockets” technology.

How long will I keep your personal data?

I keep personal information for the duration of my contract with you and thereafter as required to comply with regulations set out in law or by regulatory bodies. I do not retain personal data for longer than is necessary. I retain this information on the basis that I have a legal obligation to do so (such as for record keeping for tax purposes), or that there is a legitimate interest that I have considered carefully (such as protecting your interests).

With whom will I share your personal data?

I will never sell or transfer your personal information to a third party for marketing purposes. When necessary I may need to transfer your personal data to a health professional such as your GP. I will not do so without your agreement except in situations where there I have significant concern about harm to you or others.

Sharing information with other professional colleagues

I am a member of the UK Council for Psychotherapy (the UKCP), the British Psychoanalytic Council (the BPC) and of the British Association for Counselling and Psychotherapy (the BACP). Professional bodies require me as a member to comply with their codes of ethics, which include principles relating to the confidentiality and privacy of client information.

These codes may be found at:

<https://www.psychotherapy.org.uk/registers-standards/standards-guidance-and-policies/>

[Ethical framework - British Psychoanalytic Council \(bpc.org.uk\)](https://www.bpc.org.uk/ethical-framework)

<https://www.bacp.co.uk/events-and-resources/ethics-and-standards/ethical-framework-for-the-counselling-professions/>

I am required to have my work regularly reviewed by a qualified and trusted member of these bodies to make sure that I maintain a high standard of care. Any personal information about you that is shared as part of a professional review will always be protected by pseudonymisation, and my colleagues, like me, are governed by rigorous ethical standards as well as the law.

I am also required to share your name and contact details with two members of my psychotherapeutic community who are known as Professional Executors. The purpose of doing so is to ensure that someone can notify you if I die or become incapacitated unexpectedly. I do not share special category data about you.

Where there is a vital interest

If processing your personal information is necessary to protect someone's life, and I am unable to gain your consent to use it, I may be entitled to process it on the basis that there is a vital interest. For example, if I believe that someone else's health is at risk, I may contact a person or an organisation that is likely to be able to help.

Information collected through my website

I do not collect any information could identify you through my website. However, my website does use cookies. Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date.

They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered. They can also provide core functionality such as security, network management, and accessibility; record how you

interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them. Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

This website is hosted by Wix, which uses cookies for a number of different reasons including for security purposes; for monitoring the performance of this website; and for providing a good experience for visitors. You can read more about how Wix uses cookies at <https://support.wix.com/en/article/cookies-and-your-wix-site>

Data may be processed outside the European Union

Although my business is based in the UK, the headquarters of my website hosting provider, Wix, are in Israel. Israel is considered by the European Commission to offer an adequate level of protection for the personal information of EU Member State residents.

Your personal information may be stored through Wix's data storage, databases and the general Wix applications. Data is stored on secure servers behind a firewall.

Your data may be maintained, processed and stored by Wix and their authorised affiliates and service providers in the United States of America, in Europe (including in Lithuania, Germany and Ukraine), in Israel, and in other jurisdictions as necessary for the proper delivery of their services and/or as may be required by law.

Wix affiliates and service providers that store or process your data on Wix's behalf are each contractually committed to keep it protected and secured, in accordance with industry standards and regardless of any lesser legal requirements which may apply in their legal jurisdiction.

Wix's full privacy policy can be viewed at: <https://www.wix.com/about/privacy>

Your rights

The Data Protection Act gives you certain rights in relation to the data I hold about you. They include rights to:

- Access a copy of the information I hold about you

- Rectify inaccurate or incomplete personal information
- Object to me processing your personal information
- Ask me to delete or to restrict how I use your personal information
- Request that your personal information is sent to another data controller
- Complain to a regulator if you think I have not complied with data protection law. You can complain by following the procedure given on the website of the Information Commissioner's Office at <https://ico.org.uk/>. However, I would appreciate that you raise any concern with me first so that I can resolve it, before complaining to the ICO.

Compliance with the law

This privacy notice aims to comply with the law of every legal jurisdiction in which it might be relevant. If you think it fails to satisfy the law of your jurisdiction, please tell me.

However, ultimately it is your choice as to whether you wish to use this website and my services.