

# Privacy Policy

This privacy notice explains how I use any personal information I collect about you, as a service user (client, patient or supervisee) or when you use my website.

I provide therapy, coaching and counselling services and am based in Riogordo, Spain. This privacy notice provides information about the personal information I process about you as a data controller, in compliance with the General Data Protection Regulation (GDPR).

Please contact me at [contact@malagatherapy.com](mailto:contact@malagatherapy.com) with any questions or requests about the personal information I process.

## 1. What are your rights?

I am committed to protecting your rights to privacy. They include:

- Right to be informed about what I do with your personal data
- Right to have a copy of all the personal information I process about you
- Right to rectification of any inaccurate factual data I process, and to add to the information I hold about you if it is incomplete
- Right to be forgotten and your personal data destroyed
- Right to restrict the processing of your personal data
- Right to object to the processing I carry out based on legitimate interest

## 2. Why do I collect information about you?

I will collect information about you if you are a client or patient.

I process data because it is in the legitimate interests as a therapist. I need to see and analyse documents containing personal information in order to carry out an assessment or to deliver psychological interventions. As a client or patient my lawful reason for processing “special category data” is that it is necessary for the purposes of the provision of health or social care or treatment. Another lawful reason for me processing your data may be Legal Obligation.

## 3. What information do I collect about you?

I collect information about you that may include personal or sensitive information, such as:

- First name or given name
- Family name or surname
- Address
- Telephone numbers
- Date of birth
- Gender (or preferred identity)
- Age
- Date of Birth

- Relationships & children
- Occupation
- Telephone/SMS number
- Email address

To make sure that you are assessed and/or treated safely and appropriately, I record your personal information, such as your name, address, as well as details about all contacts you have with me such as appointments and the results of assessments and letters relating to your care/report. Your data is kept secure at all times.

I also process personal data pursuant to legitimate interests in running my business such as:

- Invoices and receipts
- Accounts and tax returns

#### Patients/Clients (Assessment/Therapy)

When you are a patient or client of I record all details of your appointments and assessment/treatment so that I can plan and review your treatment correctly.

In addition to the personal information above, I may also collect information regarding:

- Medical conditions
- Prescribed medication
- Psychological history and current difficulties
- Offences (including alleged offences)
- Financial information (if you are a private patient/client)

I may collect some of this information from your insurance company if you have one, and some of this information will be collected directly from you. Web access collection of information I collect information about you when you contact me via my website. I always try to minimise the amount of personal information that I require in order to provide a specific service or feature.

#### **4. How do I store the information about you?**

I take your privacy very seriously. I am committed to taking reasonable steps to protect any individual identifying information that you provide to me. Once I receive your data, I make best efforts to ensure its security on my systems. This includes storing hard copies of paperwork in locked filing cabinets with restricted access and storing electronic information on encrypted devices which are backed up. Please see my security policy for further details. All personal information and special category information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules.

#### **5. How long do I keep your information for?**

I do not keep your data for longer than is necessary. Administrative data is retained for up to six years as necessary, in the event there are queries from the Hacienda. Where it is not necessary to retain the data for six years, it is destroyed as soon as possible. Personal data

is retained, as necessary, for five years in compliance with professional indemnity and legal obligations. In patients under the age of 18 years, data is retained for seven years after the age of 18 years.

## **6. Who do I share your personal information with?**

Your information is kept confidential wherever possible.

However, if I become aware of your intent to cause harm to another person/organisation (e.g. terrorism), the law may require that I inform an authority without seeking your permission. In such a situation, the law may require that I share your personal information without your knowledge.

### Patients/Clients (Assessment/Therapy)

In most circumstances I will not disclose personal data without consent.

If I do need to share your information, I will always try and ask for your permission for this. I may not be able to ask your permission under special circumstances where I am professionally and/or legally required to do so.

Your information may be shared with outside organisations if they are directly involved in your care/case, for instance, your insurer if they are funding your treatment, your GP, or others involved in your care. I will discuss with you who I would discuss your care with, and what details I would share with them.

If I believe that you or others are at serious risk of harm, either from yourself or others, or if you are at risk of harming others, I will share your information with an appropriate professional (e.g. GP, mental health service, or emergency service).

When investigating a complaint I may need to share personal information with other relevant bodies.

## **7. How you can access your information and correct it, if necessary?**

I try to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if I hold any personal information by making a 'subject access request' or 'Right of Access' under the Data Protection Act and the General Data Protection Regulation.

- I will then supply to you:
- A description of all data I hold about you
- Inform you how it was obtained (if not supplied by you)
- Inform you why, what purposes, I am holding it
- What categories of personal data is concerned
- Inform you who it could be disclosed to
- Inform you of the retention periods of the data
- Let you have a copy of the information in an intelligible electronic form unless

otherwise requested. You can make a request in any way, in writing or verbally. I want to make sure that your personal information is accurate and up to date. You may ask me to correct or remove information you think is inaccurate.

#### **8. Right to erasure, otherwise known as the right to be forgotten**

Under GDPR, you may have the right for information to be erased if this is within professional and legal parameters.

#### **9. Complaints or queries**

I try to meet the highest standards when collecting and using personal information. For this reason, I take any complaints I receive about this very seriously. I encourage people to bring it to my attention if they think that my collection or use of information is unfair, misleading or inappropriate. I would also welcome any suggestions for improving procedures. If you do have a complaint, contact me. If you are not satisfied with the response from me or believe I am not processing your personal data in accordance with the law you have the right to raise your complaint with the Spanish Agencia española protección de datos (AEPD).

#### **10. Who am I and how to contact me?**

Catherine Ndong is the company (sole trader) that you are supplying your personal information to.

I can be contacted by:

Email: [contact@malagatherapy.com](mailto:contact@malagatherapy.com)

Telephone: +34 633 0606 712