

PRIVACY POLICY

You may be aware of laws relating to General Data Protection Regulation (GDPR) that have been in effect since 25th May 2018. The purpose of GDPR is to provide a set of standardised data protection laws across all EU member countries. This document sets out how I comply with these laws.



WHAT PERSONAL DATA I HOLD

Personal information means any data capable of identifying you as an individual. It does not include anonymised information. I may collect the following types of personal information about you:

- Basic information: your name, contact details, GP contact details, and video conference ID (for online therapy).
- Sensitive information: therapy records, including notes of when you were seen, therapy goals, topics discussed, social and treatment history; copies of information from other healthcare providers including letters, reports and/or outcome measures; correspondence including any emails or letters you send me.

If you are referred by a health insurance provider, then personal data provided by that organisation we will also be collected and processed. This includes basic contact information, referral information, and health insurance policy number and authorisation for psychological treatment.

HOW YOUR PERSONAL INFORMATION IS USED

I take your privacy very seriously and will take all reasonable steps to ensure the protection of your personal information.

Any information you give me will only be used to provide the services you have requested from me, and to process payment for these services. It is important that the information I hold about you is accurate and up to date, therefore please let me know if at any time your personal information changes either in person or by email (drpriyabunnell@outlook.com).

If you do not provide the personal information that is required, then I may be unable to provide a therapy service to you. For example, sometimes it may be important for me to be able to contact other professionals who are supporting you (for example, your GP); if I do not have this information I may not be able to continue to offer you a service. Should this happen I would always notify and explain it to you at the time.

HOW LONG PERSONAL INFORMATION IS STORED

Your personal information is only stored for as long as it is required. Basic contact information held on a therapist's mobile phone is deleted within 6 months of the end of therapy.

The sensitive personal information described above is retained for a period of 7 years after the end of therapy in accordance with the guidelines and requirements for record keeping by the Health and Care Professions Council (HCPC). After this time, this data is deleted at the end of each calendar year.

WHO YOUR PERSONAL INFORMATION MIGHT BE SHARED WITH

Information about each client and the therapy they receive is held in confidence. This means that no information you provide is passed on to anyone else. The exception to this is when there may be a need to liaise with other parties:

If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, then appointment schedules may be shared with that organisation for the purposes of billing. Relevant information may also be with that organisation to provide treatment updates.

In cases where treatment has been instructed by a solicitor, relevant clinical information from therapy records will be shared with legal services as required and with your written consent.

In exceptional circumstances, we might need to share personal information with relevant authorities:

- When there is need-to-know information for another health professional such as a GP, or education professional such as a teacher or pastoral worker.
- When the information concerns risk of harm to the client, or risk of harm to another adult or a child. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the level of risk to you or to someone else.
- When disclosure is in the public interest, to prevent a miscarriage of justice or where there is a legal duty, for example a Court Order.



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WHAT I WILL NOT DO WITH YOUR PERSONAL INFORMATION

I will not share your personal information with third-parties for marketing purposes.

I will never sell your information to others.

Your right to access the personal information we hold about you:

- You have a right to access the information we hold about you.
- This will usually be shared with you within 30 days of receiving a request.
- There may be an admin fee for supplying the information to you.
- Further evidence may be requested from you to check your identity.
- A copy of your personal information will usually be sent to you in a permanent form (that is, a printed copy).
- You have a right to get your personal information corrected if it is inaccurate.
- You can complain to a regulator. If you think that data protection laws have not been complied with, you have a right to lodge a complaint with the Information Commissioner's Office. If this is the case, however, I would be grateful if you would contact me first so that I can try to resolve it for you.
- Please note that your right to be forgotten cannot override the legal requirements for record keeping. In this instance I reserve the right to refuse to delete a client's personal information where this is therapy notes; these will be kept for 7 years in accordance with the HCPC guidelines.



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