

Privacy Policy (GDPR Data Protection)

This privacy notice tells you what I will do with your personal information from initial point of contact through to after counselling has ended. Your privacy is very important to me and I adhere to current data protection legislation and to the ethical guidelines regarding protecting client privacy and confidentiality set by the British Association for Counselling and Psychotherapy (BACP).

Contact details

Name: Anna Harlow Counselling

Address: Suite 7 Sabrina House, Shrewsbury, SY3 7BF

Phone number: 07375 101570

Email: annaharlowcounselling@gmail.com

Anna Harlow is registered with the Information Commissioner's Register of Data Controllers (ICO) and as such is required to be transparent about how and why personal data is gathered, recorded, stored, and how and when it is deleted.

Personal information collected by Anna Harlow

Anna Harlow currently collects and processes the following information:

- personal identifiers, contacts and characteristics (for example, name and contact details)
- information contained in emails, website contact forms, texts or other messaging services
- information recorded on voicemail or audio messages
- therapy session notes
- counselling agreements
- other necessary consent forms

How Anna Harlow gets the personal information and why she has it

Anna Harlow collects your personal information via the following ways:

- emails, website contact forms, texts or other messaging services
- voicemail or audio messages
- therapy session notes
- counselling contracts (i.e. agreements)
- other necessary consent forms

Most of the personal information Anna Harlow processes is provided to her directly by you for one of the following reasons:

- initial enquiry for counselling
- enquiry for general, non-personal advice
- your decision to engage in the therapeutic service that Anna Harlow offers

Anna Harlow also occasionally receives personal information indirectly. For example, when an individual or organisation enquires into counselling on behalf of an individual. She collects this information in order to make contact with that individual directly so that she may ascertain whether or not they wish to engage in counselling.

Anna Harlow uses the information you have given her in order to:

- contact you and explain the introductory process to counselling and psychotherapy
- arrange and send confirmation of your initial consultation
- answer any questions you may have that may relate to your needs
- write therapy session notes in order to maintain a record of your sessions, and to enhance and improve the quality of the therapeutic experience
- continue her professional development (CPD) or for marketing purposes
- analyse data trends within her practice, such as numbers of clients per year and duration of therapy

She may share your information with GPs and healthcare agencies in cases where ethical issues make it necessary to do so (see under “Confidentiality”, below).

Lawful Basis

Under the UK General Data Protection Regulation (UK GDPR, 2018), the lawful bases Anna Harlow relies on for processing this information are:

(i) Legitimate interest:

- providing a counselling service to the public
- operating this practice as a business to generate a livelihood
- promoting and marketing this business
- protecting Anna Harlow’s professional and ethical reputation as a therapist where necessary
- pursuing and fulfilling a vocation

(ii) Contract: data processing is necessary for a contract Anna Harlow has with a client or supervisee. Contracts include a *Counselling Agreement* that sets out ethical boundaries, confidentiality, client and supervisee rights, agreed fees, etc.

Special Category Condition

As a counsellor, Anna Harlow processes personal information and data under a Special Category Condition in accordance with the Data Protection Act 2018. This special category identifies a *Substantial Public Interest* condition which includes counselling and psychotherapy. See Data Protection Act 2018, Article 9(g), DPA 2018 condition of Schedule 1, Part 1, Paragraph 17: *Counselling, etc.*

How Anna Harlow stores your personal information

Anna Harlow will protect your information securely in any or all of the following ways:

- computer, phone or device access passwords
- encrypted documentation
- password-protected back-ups on local drives
- ultimate back-ups automatically deleted after approximately 18 months
- all information on paper will be secured in a locked filing cabinet

Anna Harlow will dispose your information in the following ways:

- session notes will be kept electronically and encrypted. These will be retained for the legal requirement of 7 years after which time they will be deleted.
- emails will be deleted within 24 months
- personal contact details will be deleted after 7 years

Your data protection rights

Under data protection law, you have rights including:

- *Your right of access:* You have the right to ask Anna Harlow for copies of your personal information.
- *Your right to rectification:* You have the right to ask Anna Harlow to rectify personal information you think is inaccurate. You also have the right to ask Anna Harlow to complete information you think is incomplete.
- *Your right to erasure:* You have the right to ask Anna Harlow to erase your personal information in certain circumstances.
- *Your right to restriction of processing:* You have the right to ask Anna Harlow to restrict the processing of your personal information in certain circumstances.
- *Your right to object to processing:* You have the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, Anna Harlow has one month to respond to you. If you wish to make a request please write to Anna Harlow at the contact details above.

Confidentiality

All therapy sessions will be conducted in confidence and notes held on encrypted software.

Confidentiality, in accordance with the General Data Protection Regulation 2018 (GDPR), will be maintained and applied to all records with the exception of the following:

when you have given your consent to share information, for example, your GP, specialist or other agency in cases where Anna Harlow has a duty to share information regarding (but not limited to) the following:

- when compelled to give evidence by a court of law
- if it is considered there is a real possibility of harm to yourself or others, or in such instances when information is of such a gravity that confidentiality cannot be maintained, for example:
 - – safeguarding adults (adult protection)
 - – safeguarding children (child protection)
 - – offences involving children under the age of 18
 - – in cases of terrorism, drug trafficking or money laundering

Website

This Privacy Policy sets out how Anna Harlow Counselling uses and protects any information that you provide when you use the www.annaharlowcounselling.co.uk website. By visiting the www.annaharlowcounselling.co.uk website you accept and consent to the terms described in this privacy policy. Anna is committed to ensuring that your privacy is protected.

Security

Transmission of data and information via the website is not a secure or an encrypted transmission method for sending your personal data, unless otherwise indicated on the website. Your attention is therefore drawn to the fact that any information and personal data carried over the internet is not secure. Information and personal data may be intercepted, lost, corrupted or accessed by other people.

Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Anna Harlow may use traffic log cookies to identify which pages are being used. This helps analyse web page traffic and improve the website in order to tailor it to customer needs.

Overall, cookies help Anna provide you with a better website, by enabling her to monitor which pages you find useful and which you do not. A cookie in no way gives Anna Harlow access to your computer or any information about you, other than the data you choose to share with her.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to external websites

Anna Harlow's website may contain links to other websites of interest. However, once you have used these links to leave www.annaharlowcounselling.co.uk you should note that Anna Harlow does not have any control over that other website. Therefore, she cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

Anna Harlow will not sell, distribute or lease your personal information to third parties unless she has your permission or is required by law to do so.

Anna Harlow aims to keep all personal data up to date. If you believe that any information she is holding about you is incorrect or incomplete, please write to Anna

Harlow as soon as possible, at the above address and she will promptly correct any information found to be incorrect.

Amendments and updates

Anna Harlow may amend and/or update this privacy policy from time to time without notice, in which case she will publish the amended version on the website. Anna Harlow shall not be liable to you or any third party for any changes made to this privacy policy. It is your responsibility to check this page from time to time to ensure that you understand and accept any changes.

How to complain

If you have any concerns about Anna Harlow's use of your personal information, you can make a complaint to her by writing to the contact details above or emailing to annaharlowcounselling@gmail.com. She will acknowledge your complaint within 30 days of receipt of your correspondence and will respond without undue delay.

You can also complain to the ICO if you are unhappy with how she has used your data. The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

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