Privacy Policy as at 05/06/25

Contact details:

Name: Kirsten Malcolm (t/a Freedom Therapy)

Phone: 07886 845545

E-mail: kirstenm.therapy@gmail.com

This document describes the way I, Kirsten Malcolm (data controller) of Freedom Therapy processes (collects, stores, shares & disposes of) personal data which you (the client) provide as a part of the working relationship. You are kindly requested to read this and decide if you are happy to share this information. You should sign the contract on commencement of the work to indicate your informed consent.

If submitting an online enquiry form via my website www.freedomwiththerapy.com:

1. Name and
2. Contact details

N.B. These are deleted if you do not proceed with treatment

On becoming a client:

1. Name
2. Address
3. Telephone number
4. Email address
5. Date of Birth
6. Emergency contact details
7. Relevant medical history
8. Session notes- my brief notes about our work

Reasons for keeping personal data:

1. I can be in contact with you during our relationship, to make or change appointments;

2. If circumstances mean we must stop our work together. For instance, where unlawful activity such as terrorism and money laundering are suspected. This is a legal obligation;
3. As an obligation to my insurance company;
4. If I believe there is risk to you or another person(s).

Storing and disposing of personal data:

1. I store your name, email address and telephone number electronically only. I am obliged to keep these as an archive for seven years after we complete our work for insurance purposes.
2. I will not contact you after our work ceases. Should you wish to work together again please get in touch with me.
3. I also keep brief notes of attendance and topic of discussions.
4. You will be assigned a client code by me, and only this will be used to identify your documents and session attendance notes.
5. The contract and session notes are kept for a period of 7 years for the purposes of legal action & defence. This is a requirement of my insurance company (Balens Insurance).
6. All paper based personal data is scanned, named with your individual client code, saved and stored securely. The hard copy is immediately shredded.

Data sharing:

1. Your contact information such as name, telephone number and email address are provided to me by you through the following means:

a. Sent via the contact form on my own website (Host is Wix).

b. Other referring organisations or individuals.

c. Given by you directly during assessment/contracting.

2. As described above these contact details are kept for the duration of our therapy relationship and for 7 years afterwards.

3. As detailed in our therapy contract your personal data will not be shared unless you have discussed and agreed to this. Exceptions are unlawful activity.

4. I will not share your personal data with a third party for reasons other than referral or risks identified.

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Your rights to see your personal data:

1. You have the right to request to see personal data held by me, Kirsten Malcolm

2. Please make the request in writing at kirstenm.therapy@gmail.com

3. This personal data will be shared within 1 month of your request

4. This is free of charge

5. You can ask that any incorrect or irrelevant information is deleted

6. Breaches are reported to the Information Commissioner's Office

7. The GDPR regulations can be viewed at the ICO (Information Commissioners Office) at https://ico.org.uk

GDPR

Adherence to the Data Protection Act (2018) ensures your sensitive and personal data is collected and stored securely and ensures your rights as a consumer are fully protected, from identifiable data such as the details on this form i.e. name and address, and any notes collected during/for our sessions, plus any communication such as emails and/or texts. Collecting and storing this information will help me provide a high-quality service and ensure I am fully prepared and equipped for our sessions.

All of your personal information is stored securely. My computer is password protected. All electronic records and documents are password protected. My email is secure and requires a login every time. My phone is secured with a pin code. I do not keep hardcopies.

I will hold your data for 7 years, at which point your records will be permanently deleted. If you do not wish me to keep your records for 7 years, or you wish your data to be erased at any time before the 7 years has passed, you should make a request in writing. Once requested, I will permanently delete any electronic data from devices, including any data in emails and on my phone. The only data that I would keep would be your request to delete your data.

Anything discussed and disclosed during our sessions is strictly confidential and will be kept between you and me (except in situations where I am required to do so by the law). For example, if (during any of our sessions) you disclosed that you were going to harm yourself or someone else, I am legally obliged to inform the relevant authorities. Additionally, if I received a Police Warrant or a Court Order for your data, I would be required to provide this information by law.

There may also be times when I decide I need to discuss elements of our sessions with my Supervisor to ensure I am giving you the best support. Discussing your case with my

Supervisor would be fully anonymised and I would refer to you as 'my Client' (only divulging relevant parts of our session i.e. where I feel I need clarification or support, for example).

Adhering to GDPR regulations, contact with your GP or any other Healthcare Professional would only ever be made when absolutely necessary, and only with your prior consent.

How to complain

If you have any concerns about my use of your personal information, you can make a complaint to me via one of the contact methods above. You can also complain to the ICO if you are unhappy with how I have 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