



## Data Protection Policy

This is the data protection policy of Wilson Psychology Ltd. In this document, "we", "our", or "us" refer to Wilson Psychology Ltd, company number 12275622, registered in the UK. Our registered office is at 57a Commercial Road, Rothwell, LC26 0QD.

### Introduction

This policy will explain how we use the data we collect from you when providing you with psychological assessment and/or therapy. Our policy complies with the Data Protection Act 2018, incorporating the EU General Data Protection Regulation (GDPR). Wilson Psychology Ltd. is registered with the Information Commissioner's Office (ICO) and Dr Flora Wilson is the Data Controller.

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data. We do this now, by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

### Why do we collect data?

Wilson Psychology has a legitimate interest to collect and retain personal and sensitive information for the purpose of providing individuals with psychological services. We also need to use data in order to process payments and to help prevent serious harm. We cannot provide you with a service unless you allow us to collect and store your information.

### What data do we collect?

- Personal information, such as your name, email address, postal address and telephone numbers, and GP details.
- Sensitive information, such as your gender, social and medical history, and clinical notes from therapy sessions.

### How do we keep data secure?

Personal contact information may be stored on a mobile telephone, on a laptop computer, and within our online telephone and email systems. All devices and accounts are securely password-protected and the information can only be accessed by Dr Flora Wilson. Our website server, telephone system and email systems are based within the European Union and are GDPR compliant.

Personal and sensitive information will be stored on our cloud-based Clinic Management system, *WriteUpp*. Data sent via the internet to our *WriteUpp* account is encrypted 'in flight', and the account can only be accessed by Dr Flora Wilson via a secure password. *WriteUpp* uses an EU-based data centre and is GDPR compliant. Personal and sensitive information may also be stored within a cloud-based document storage service, *Tresorit*, which uses end-to-end encryption and is GDPR compliant. Our *Tresorit* account can only be accessed by Dr Flora Wilson via a secure password. Any sensitive information transmitted electronically via email will be encrypted and/or password protected. Please note that we cannot guarantee the security of your own email account and you accept responsibility for this risk when you consent for us to email you.

Any information recorded on paper, such as rough session notes, will be transferred to a secure electronic format as soon as possible and then destroyed. If it is necessary to retain information on paper, this will be stored in a locked cabinet at Dr Flora Wilson's address.

When conducting therapy online, we use the video-conferencing service, *Zoom*. All meetings over *Zoom* are end-to-end encrypted to ensure privacy. Online sessions will be conducted over a secure, password-protected internet connection. Please note that we cannot guarantee the security of your own internet connection and you take responsibility for this when booking an online session.

### **How long do we keep data for?**

In line with professional guidelines and insurance requirements, data will be retained for a period of seven years following the end of our therapeutic contact with you (or for seven years following your 18th birthday if you are a minor). Following this time period, all personal and sensitive data will be securely destroyed.

### **Disclosure and sharing of data**

We will not share your personal or sensitive information with a third party without your explicit consent (and/or the consent of a parent or guardian if you are under 16 years of age). In certain circumstances, we may have a professional or legal duty to share data without consent, for example in the event of serious concerns about an individual's safety, or child safeguarding concerns. In such a situation, you will be informed of the need to share your data (when possible) and the information will only be shared with necessary statutory agencies, such as your GP or Social Care.

As part of maintaining their professional standards and accreditations, Clinical Psychologists are required to undertake regular supervision with another suitably qualified professional. Your information may be shared in anonymised form for the purpose of supervision. The supervisor will be bound by the same professional and legal standards around confidentiality and data protection.

### **Data access requests and accuracy**

You have the right to request a copy of all the information that we hold about you. Following a request in writing, we will provide this information within 30 days, free of charge. You also have the right to ensure that data we hold about you is accurate and up-to-date, and to ask us to amend any inaccuracies.

### **How to contact us**

If you have any questions about this data protection policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us. Email us at: [flora@wilsonpsychology.co.uk](mailto:flora@wilsonpsychology.co.uk)  
Call us: 01249 847456

### **Complaints**

Should you wish to report a complaint or if you feel that Wilson Psychology Ltd has not addressed your concern in a satisfactory manner, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.