Privacy notice

White Lodge Therapy LLP

About this notice

This notice explains how White Lodge Therapy LLP looks after personal information: what we collect, why we hold it, who we may share it with and the rights you have over it.

It covers everyone we hold information about, including people who enquire without becoming clients, current and former clients, and people connected to our work such as family members or referrers.

Who we are

Each therapist who works at White Lodge Therapy LLP is responsible for the records of their own clients. Your therapist is the data controller for your therapy notes and the other records they keep about your sessions. Controller is the legal term for whoever decides how and why personal information is used.

Where the practice handles information for everyone, for example when you first get in touch or book an appointment through the practice, White Lodge Therapy LLP is the data controller for that information. This notice covers both, and "we" in it means the practice and your therapist.

The therapists who work at White Lodge Therapy LLP, and the names they work under, are listed in the table at the end of this notice.

Questions about this notice, or about your information, go to Data Protection Officer. The quickest route is email: contact@whitelodgetherapy.co.uk.

You can also call us on 01376 440920.

Our practice address is 21 Coggeshall Road, Braintree CM7 9DB.

We are registered with the Information Commissioner's Office (ICO), the UK's data protection regulator. Our registration number is ZC109101.

Who this covers

We hold different amounts of information about different people. For most website visitors it is very little; for clients it includes the records we make in the course of our work together. This notice covers:

- people who contact us with an enquiry
- current and former clients
- family members, partners and other people who appear in our records
- people who refer clients to us, and professionals we work alongside
- visitors to our website

The information we hold

What we hold depends on your relationship with us. It can include:

- your name and contact details
- appointment and payment records
- what you share with us during our work together, and the notes we make about that work
- correspondence such as emails, letters and messages

We collect what the work needs and no more.

We ask clients for an emergency contact. We use those details only in a genuine emergency and never contact that person for any other reason.

Where information comes from

Most of the information we hold comes directly from you: when you get in touch, complete a form, or talk with us during our work together.

Some information reaches us from other people, for example a referral from a GP or another professional, details passed on by a parent or guardian, or information from an organisation that arranges your sessions. When that happens we use only what we need, and this notice applies to that information in the same way.

Why we use information, and our lawful bases

The law requires a valid reason, called a lawful basis, for every use of personal information. This section lists each purpose we use information for and the basis we rely on. We have reviewed and confirmed each one.

Handling enquiries. Reading and replying when you contact us, and keeping a record of that exchange for a reasonable period. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Assessing whether we can help. Initial conversations and intake questions that help us decide together whether our service is right for you, including when the best answer is a referral elsewhere. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Providing the service itself. Running sessions, keeping in touch about the work and doing what we have agreed with you. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Managing appointments. Booking, rearranging and cancelling sessions and, where used, sending reminders. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Taking payment. Invoicing, processing payments, issuing receipts and keeping the financial records the law requires. Our confirmed legal basis for this purpose is Contract (Article 6(1)(b)).

Keeping clinical records. Making and keeping session notes, assessments and related correspondence so the work is documented safely and professionally. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Clinical supervision. Discussing our client work with a clinical supervisor, as our profession expects, keeping identifying details to the minimum the discussion needs. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Safeguarding. Recording concerns and, where necessary, telling an appropriate authority that a child or an adult may be at risk of harm. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Emergencies. Contacting emergency services or your emergency contact if we believe your life, or someone else's, is in immediate danger. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Handling complaints. Receiving, looking into and responding to complaints, and keeping a record of what happened. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Responding to data rights requests. Handling requests to see, correct or delete information, including checking who is asking. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Legal claims. Using records if a dispute arises, for example a fee dispute, an insurance matter or a court order for notes. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Tax and accounting. Keeping invoices and financial records, filing returns and sharing what is needed with our accountant and HMRC. Our confirmed legal basis for this purpose is Legal obligation (Article 6(1)(c)).

Professional body requirements. Meeting the requirements of our professional membership, such as holding insurance, engaging in supervision or cooperating with a conduct process. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Insurance. Holding professional insurance and giving our insurer what it needs if a claim or notification arises. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Keeping our website secure. Security logging, blocking attacks and preventing spam, which involves technical details such as IP addresses. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)).

Recruitment and employment. Handling applications, references, contracts, payroll and related records for people who work with us. Our confirmed legal basis for this purpose is Contract (Article 6(1)(b)).

Evaluation and research. Using information, anonymised wherever possible, to evaluate outcomes or contribute to research. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

AI supported processing. We use information for this purpose as described in our practice arrangements. Our confirmed legal basis for this purpose is Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2.

Health and other sensitive information

Some kinds of information get extra legal protection, including anything about health, sex life or sexual orientation, race or ethnic origin, religious or philosophical beliefs, and biometric data. The law calls this special category data. Therapy involves health information by its nature, so much of what clients share with us falls into this group.

To use special category information we need both a lawful basis and a further specific condition, and we treat it with particular care.

For the health information involved in providing our service, we rely on the condition for health and social care (Article 9(2)(h) UK GDPR, with Schedule 1 of the Data Protection Act 2018). This applies because the information is used for care provided under the responsibility of a professional who owes a duty of confidentiality.

Information about criminal offences

Occasionally our records include information about criminal offences or allegations, for example something disclosed in a session or recorded as part of a safeguarding concern. The law sets additional conditions for this kind of information (Article 10 UK GDPR and the Data Protection Act 2018), and we record and use it only where it is necessary and those conditions are met.

Clinical records

We keep clinical records of our work with clients, typically session notes, assessments and relevant correspondence. Records help us provide safe, consistent care. They are stored securely, access is limited to the people who genuinely need it, and they are kept for the periods set out in our retention policy before being securely destroyed.

Supervision

Like most therapy professionals, we have regular clinical supervision, where aspects of client work are discussed with an experienced supervisor. Supervision protects the quality and safety of the work. Our supervisor is bound by the same expectations of confidentiality that we are, and we share the minimum needed for the discussion, avoiding identifying details wherever possible.

Safeguarding and exceptional disclosures

What clients share with us is confidential, and we protect that confidence carefully. There are a small number of situations where the law or someone's safety can require us to share information without consent:

- when we believe a child or an adult is at serious risk of harm
- when we believe there is an immediate risk to someone's life
- when a court orders us to disclose information, or a legal duty requires it

Wherever it is safe and possible we talk to the person concerned before sharing anything, and we only ever share the minimum needed with the appropriate authority.

Who we share information with

We share information only where there is a genuine need and a proper basis, and only the minimum required. Depending on your situation, recipients can include:

- where we have clinical supervision, our supervisor, as described above
- your GP or another healthcare professional, normally with your agreement

- emergency services or safeguarding authorities, in the situations described above
- professionals who support the running of the practice, such as an accountant or IT support

We never sell personal information, and we never share client information for anyone else's advertising.

Where sessions are funded through health insurance, we share what the insurer needs to arrange and pay for your care, normally your name, policy details, attendance and invoicing information. We tell you what a funder can see before the work starts.

Where sessions are arranged through an employer or an employee assistance programme (EAP), the provider normally receives limited administrative information, such as attendance. They do not receive our session notes. We tell you exactly what a referrer can see before the work starts.

Where we take referrals from the NHS or another public service, we follow the record keeping and reporting arrangements of that contract, and we tell you what they involve at the start of the work.

Services that process information for us

Like almost every modern practice, we use carefully chosen services to run day to day, for example email, secure storage, booking or payment tools. These providers act on our instructions under contracts that require them to protect your information, and they are not allowed to use it for their own purposes. We keep a record of every service we use and review it regularly.

Information leaving the UK

The information we hold is stored and processed in the UK. If that ever changes, we will update this notice and put a recognised safeguard in place first.

How long we keep information

We keep different kinds of records for different lengths of time, and we do not keep anything longer than we need to. Clinical records are generally kept for a set period after

the work ends, in line with professional guidance and insurance requirements. Our retention policy sets out each category, the period that applies and the reason for it. You are welcome to ask us for a copy.

How we protect information

We take the security of your information seriously. The measures we use are proportionate to the sensitivity of what we hold, and include keeping devices and accounts protected, limiting access to the people who need it, and storing records securely whether they are digital or on paper. No system is perfectly secure, but we work to keep risks low and we review these measures regularly.

Your rights

You have rights over your personal information. In summary:

- **Access.** You can ask for a copy of the information we hold about you.
- **Correction.** You can ask us to correct information that is inaccurate or incomplete.
- **Deletion.** You can ask us to delete information. This right has limits: for example, we may need to keep clinical records for a period even after such a request, and we will always explain our reasons.
- **Restriction.** You can ask us to pause our use of information while something is resolved.
- **Objection.** You can object to particular uses of your information. For marketing, we simply stop.
- **Portability.** In some circumstances you can ask for information you gave us in a reusable format, or for it to be sent to another provider.
- **Withdrawing consent.** Where we rely on your consent, you can withdraw it at any time.

To use any of these rights, contact us at contact@whitelodgetherapy.co.uk. We normally respond within one month. If a request is complex we can extend that by up to two further months, and we will tell you within the first month if so. There is normally no charge.

Before sharing records we make sure a request really comes from you, or from someone genuinely authorised to act for you. For a current client, replying through the contact details

we already hold is often enough; occasionally we may ask for more.

Therapy records often mention other people, such as a partner or family member. When we respond to a request for records we handle other people's details fairly, which usually means removing or summarising them unless it is appropriate to include them.

Raising a concern

If you are unhappy with how we have handled your information, please tell us. Contact Data Protection Officer at contact@whitelodgetherapy.co.uk and we will do our best to put things right. Our complaints procedure explains what happens next.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at any time. You can do this at ico.org.uk/make-a-complaint. We would welcome the chance to address your concern first, but you do not have to come to us before going to the ICO.

Children and young people

We work with children and young people, and their information gets particular care. We explain how we handle information in a way each young person can understand, and confidentiality applies to them just as it does to adults, within the safeguarding boundary described above.

Who agrees to the work, and who can ask about it, depends on the young person's age and understanding. Many older teenagers can consent for themselves. Where a parent or guardian is involved, we are clear with everyone from the start about what will and will not be shared with them.

AI tools and automated processing

We use AI tools for some parts of our work. AI here means software that processes information to produce text, transcripts or suggestions, for example a transcription service or a tool that helps draft notes. This section explains how we keep that use careful and transparent.

Some client information is processed by these tools. We choose tools carefully, use the most protective settings available to us, and share the minimum the task needs. The providers of these tools are covered by the services section above and, where it applies, by the section on information leaving the UK.

A person always reviews what an AI tool produces before it is relied on. Nothing goes into a clinical record without being checked and corrected by us first.

If you would rather AI tools were not used with your information, tell us and we will make that work, for example by taking manual notes instead.

No decisions about you are made by software alone. Any tool we use only ever supports our own professional judgement, and a person is always involved in decisions that affect you.

Marketing

We do not send marketing emails or texts. If you hear from us, it is about your care or something you have asked about.

Our website

Our website collects a small amount of technical information about visits, such as the pages viewed and the browser used, which keeps the site working and secure. Our cookie and storage technologies policy explains what runs on the site and the choices you have.

If you use a form on our site, what you enter comes to us so we can respond. Form messages are treated with the same care as any other enquiry, so please share only what you are comfortable sending this way.

Changes to this document

We keep this notice under review and update it when our practice or the law changes. The version number, the date it took effect and the date of the next planned review are shown at the end. If we make a significant change, we will draw attention to it rather than changing things quietly.

The therapists who work here

Therapist	Works under the name
Lyn Hemeury	Lyn Hemeury Counselling
Jula Lewsey	Jula Lewsey Therapy
Elizabeth Scott	Elizabeth Scott Counselling
Tanya Sillett	T.S Counselling Services
Jon Stenner	Menssanatherapy
Mark Prestney	Mark Prestney CBT
Jenna Francis	Jenna Francis Counselling Services
Sidney Slaney	UVU Therapy
Debra Sparshot	Clarity Counselling & Wellbeing Coaching
Clare Biggs	CLB Therapies
Angela Noble	Angela Noble Therapy
Cara Cobb	Cara Cobb Counselling Service
Meryl Lawrence	Meryl Lawrence Therapies
Jacinta Deacon	Inclusive Therapy Practice
Alex Helm	Tidy Soul Therapy
Maria Alvarez	Maria Alvarez
Susie Birnie	Tirol House Therapy Practice
Dean Andrews	Dean Andrews Psychotherapy & Counselling

Your retention schedule

Record	Period starts	How long	Reason	Source	Disposal

unsuccessful enquiries	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
waiting lists	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
current client admin	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
adult clinical records	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
child young person records	End of therapy	7 other	Until client age 25 - Allows for claims after reaching adulthood	UK GDPR, BACP, insurer norms	other
couples family records	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
supervision records	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other

session recordings	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
consent records	End of therapy	7 years	Civil claim limitation period; defensible under GDPR	UK GDPR, BACP, insurer norms	other
financial records	End of therapy	7 years	HMRC requirement	HMRC	other
complaints	End of therapy	7 years	Legal defensibility; complaints may lead to claims	ICO	other
rights requests	End of therapy	7 years	Demonstrate compliance with GDPR	UK GDPR	other
safeguarding	End of therapy	20 years	High-risk category; long-tail claims	NHS retention schedule	other
legal claims	End of therapy	20 years	Legal defensibility; long-tail claims	NHS retention schedule / insurer norms	other
insurance correspondence	End of therapy	7 years	Part of clinical/administrative record; needed for claims	UK GDPR, BACP, insurer norms	other
breach records	Date the breach was closed/resolved	7 years	To evidence compliance, allow ICO investigation, and cover Limitation Act claims	ICO	other

website form submissions	When enquiry is closed or becomes inactive	7 years	7 years aligns with Limitation Act for contract/tort claims	ICO	secure digital deletion
marketing consent	When consent is withdrawn	2 years	To demonstrate lawful basis for marketing and defend against complaints	ICO	secure digital deletion
staff records	End of practising at the practice	7 years	HMRC	HMRC	secure digital deletion
backups	Date backup is created	7 years	Backups must not retain client data longer than the live system	ICO	secure digital deletion

Services handling information

Provider	Product	Purpose	Information	Hosting	Transfers
Truly Empowered	Hosting	Website Hosting	Name, account status, account navigation options	uk	no transfer
Microsoft 365	Domain and email	Domain and email	Domain and email	uk	no transfer
Therapy Webgenie	Contact form	online appointment booking form	Personal details, reason for therapy,	uk	no transfer

Provider	Product	Purpose	Information	Hosting	Transfers
Room Booking System	Room Booking System	Room bookings, therapist availabiity, client appointments with a therapist	Therapist name, client information for therapy appointment, therapist availability	eea	uk adequacy
Microsoft Teams	Microsoft Teams	Video sessions	Identitiy information, account and usage information, device & technical information, compliance and security information	uk	no transfer
My Ruby	Virtual PA service	telephone calls	Clinic information, therapist details, room booking access information which hold client information	eea	uk adequacy
Microsoft	Microsoft Onedrive	Cloud storage and file syncing	Identitiy information, file and content, device & technical information, security compliance and organisational controls	uk	no transfer

Purposes and confirmed legal bases

Purpose	Legal basis	Why it applies
AI supported processing	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Managing appointments	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Assessing whether you can help someone	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Keeping clinical records	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Handling complaints	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Handling enquiries	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Holding and using insurance	Legitimate interests (Article 6(1)(f))	I rely on legal obligation because I must hold and use insurance as part of professional and regulatory requirements. This purpose does not involve health or other special-category data, so no Article 9 condition is required. I have checked these bases and confirm they fit this purpose.

Purpose	Legal basis	Why it applies
Defending or bringing legal claims	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Taking payment	Contract (Article 6(1)(b))	I rely on the legal basis of contract because I need to process payments in order to provide the agreed therapeutic service. This involves only basic personal information and financial details, not health or other special-category data, so no Article 9 condition is required. I have checked these bases and confirm they fit this purpose.

Purpose	Legal basis	Why it applies
Meeting professional body requirements	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Providing the therapy or service itself	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Recruitment and employment	Contract (Article 6(1)(b))	I rely on the legal basis of contract because I need to process personal information to assess applications, communicate with candidates, and manage employment. This purpose does not normally involve health or other special-category data, so no Article 9 condition is required. I have checked these bases and confirm they fit this purpose.
Research and evaluation	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Responding to data rights requests	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Acting on safeguarding concerns	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.

Purpose	Legal basis	Why it applies
Discussing work in supervision	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Tax and accounting	Legal obligation (Article 6(1)(c))	I rely on the legal basis of legal obligation because I must keep financial records to meet tax and accounting requirements under UK law. This purpose does not involve health or other special-category data, so no Article 9 condition is required. I have checked these bases and confirm they fit this purpose.

Purpose	Legal basis	Why it applies
Emergencies where someone’s life is at risk	Legitimate interests (Article 6(1)(f)); Article 9(2)(h) health or social care with Schedule 1 condition 2	I rely on legitimate interests because I need to use personal information to respond to enquiries, assess whether I can help, provide therapy, manage appointments, keep records, and act on risks. These activities are necessary for running a safe and effective therapy practice, and clients reasonably expect them. Where information includes health or other special-category data, I rely on the condition for providing health or social care (Article 9(2)(h)). This fits because I am a counsellor offering therapeutic services, and the information is used solely for delivering and supporting those services.
Keeping your website secure	Legitimate interests (Article 6(1)(f))	I rely on legitimate interests because I need to keep my website secure, prevent misuse, and ensure it functions correctly. This involves only technical information such as IP addresses and device details, not health or other special-category data, so no Article 9 condition is required. I have checked these bases and confirm they fit this purpose.

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This document was prepared from information provided by the practice. It is general information, not legal advice.