



PRIVACY POLICY

Introduction

Your privacy is very important to me, and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current data protection legislation, including the UK GDPR, the Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and the Data (Use and Access) Act 2025.

This privacy notice tells you what I will do with your personal information from initial point of contact through to after your counselling has ended, including:

- Why I can process your information and the purposes for which I use it
- Whether you must provide it to me
- How long I store it for
- Whether there are other recipients of your personal information
- Whether I intend to transfer it to another country
- Whether I automate decision-making or profiling
- Your data protection rights.

I am happy to chat through any questions you might have about this privacy notice.

The 'data controller' is the person or organisation responsible for deciding how and why personal data is processed. I am the data controller for Elephas Counselling.

I am registered with the Information Commissioner's Office (Registration No. ZA889917). My phone number is: 07838 406497 and my email address is: karen@elephascounselling.co.uk.

My lawful basis for holding and using your personal information

Under the UK GDPR, I must have a lawful basis for processing your personal information. The lawful basis I use depends on why I am processing your information.

If you are currently having counselling with me, or you contact me because you are considering counselling, I will process your personal information where this is necessary to take steps towards, or for the performance of, our contract.

After counselling has ended, I rely on legitimate interests as my lawful basis for retaining your personal information where this is necessary for the legitimate interests of my counselling practice.

During counselling you may share sensitive information with me, including information about your physical or mental health. This is known as 'special category data' and receives additional protection under data protection law. I process this information under the health or social care condition in Article 9(2)(h) of the UK GDPR, for the provision of counselling, alongside the relevant provisions of the Data Protection Act 2018.

How I use your information

Initial contact

When you contact me with an enquiry about my counselling services, I will collect information needed to respond to your enquiry. This may include your name, email address and/or telephone number, along with any other information you choose to provide about yourself or the reason for your enquiry. Alternatively, your GP or another health professional may send me your details when making a referral or a parent or trusted individual may provide your details when making an enquiry on your behalf. If you decide not to proceed, or I have not heard from you again, I will delete the personal information relating to your enquiry as part of my regular monthly data review, unless there is a legitimate reason for me to retain it. If you would like me to delete this information sooner, you can ask me to do so.

While you are accessing counselling

Everything you discuss with me is treated as confidential. There are, however, limited circumstances where I may need to share information. This may include where I believe that you or someone else is at risk of serious harm, or where I am legally required to disclose information. Where appropriate and possible, I will discuss this with you before sharing information.

Where it is necessary to protect you or someone else from serious harm, information may be shared with an appropriate person or service, such as your GP, the police or emergency services.

There are also circumstances where I may be legally required to disclose information, including certain information relating to terrorism, money laundering or drug trafficking, or where disclosure is required by a court.

It is a professional requirement for counsellors to attend regular supervision to maintain an ethical practice. During these sessions, I discuss my client work with my supervisor. I may use your first name during supervision but avoid sharing other identifying information unless it is relevant and necessary for the supervision of my work. Supervisors may keep confidential notes of their meetings with counsellors in line with guidance from their professional body. My supervisor may also be given access to limited contact information for current clients if I become unexpectedly incapacitated or die, solely so that they can contact you about the closure or temporary interruption of my practice.

I keep a record of your personal details and very brief written notes of each session to help me provide the counselling service. These details are stored securely and are not routinely shared with third parties. Telephone numbers stored in my mobile phone are saved under a code name.

I do not retain routine text messages or emails for longer than necessary. If a message or email contains information that needs to form part of your counselling record, I will add the relevant information to your secure personal file.

After counselling has ended

Once counselling has ended, your counselling records will normally be kept for five years from the end of our contact and will then be securely destroyed.

You can ask me to delete your personal information sooner. I will consider your request in accordance with your data protection rights, although there may be circumstances where I need to retain some or all of your information, for example to meet legal or professional obligations or to establish, exercise or defend legal claims.

Marketing and newsletters

If you choose to sign up for my newsletter or marketing emails, I will use your name and email address for this purpose with your consent. Your details are stored on MailerLite, a third-party email marketing platform which processes this information on my behalf.

I will use these details to send you information about my services, wellbeing resources and other news that may be of interest to you. You can withdraw your consent and unsubscribe at any time by using the unsubscribe link included in every email or by contacting me directly.

I will not sell or share your contact details with other organisations for their own marketing purposes.

You can read more about how MailerLite handles personal information in their [privacy policy](#).

Your rights

I try to be as open as I can be in giving people access to their personal information. You have the right to ask me to delete your personal information, to limit how I use your personal information, or to stop processing your personal information. You also have the right to ask for a copy of the personal information I hold about you and to object to the use of your personal information in some circumstances.

You can read more about your rights on the [ICO website](#).

If I do hold information about you, you can ask me to:

- give you a description of it and tell you where it came from
- tell you why I am holding it and how long I will store it
- tell you who it could be disclosed to
- provide you with a copy of your personal information in an intelligible form

You can also ask me to correct inaccurate personal information I hold about you.

You can make a request for access to your personal information verbally, by message or by email to karen@elephascounselling.co.uk. I will respond to a request without undue delay and normally within one month.

If you have a complaint about how I handle your personal information, please contact me using the contact details given above. I will acknowledge your complaint within 30 days, investigate it appropriately and respond without undue delay. I will keep you informed where appropriate.

If you are not satisfied with my response, you can make a complaint to the Information Commissioner's Office (ICO), the UK's independent regulator for data protection. More information is available at ico.org.uk/make-a-complaint.

Data security

I take the security of the personal information I hold seriously and use appropriate measures to protect it from unauthorised access, loss, misuse or disclosure.

Current client records are stored on my password-protected and encrypted computer. Individual client documents are also password protected and client files are identified using a client code rather than your full name.

When counselling has ended, records may be stored using Google Drive for the remainder of the five-year retention period. Client documents stored in this way remain password protected and access to my Google account is protected by two-step verification.

Telephone numbers stored on my password-protected mobile phone are saved using a client code rather than your full name.

A limited emergency contact record containing the contact details of current clients is also kept securely offline. This is solely to enable my supervisor to contact clients if I become unexpectedly incapacitated or die.

Emails sent to karen@elephas counselling.co.uk are accessed only on my password-protected devices.

Third-party service providers

I use trusted third-party service providers to support the operation of my practice. These include Zoho for email, Google for cloud storage and some email services, MailerLite for newsletters and Wix for my website. Where these providers process personal information on my behalf, I take appropriate steps to ensure that appropriate data protection safeguards are in place.

International transfers

Some of the service providers I use may process or store personal information outside the UK. Where personal information is transferred internationally, I use providers that have appropriate safeguards in place in accordance with UK data protection law, such as UK adequacy regulations or approved contractual safeguards.

Visitors to my website

My website is hosted and managed using Wix. When you visit my website, Wix may process technical information about your visit, such as information about your device, browser and how you use the website. I use Wix Analytics to help me understand how visitors use my website and to improve my website and services.

My website uses cookies and similar technologies. Some cookies are necessary for the website to function properly. Other cookies, including those used for analytics, will only be used with your consent and according to the choices you make through the website's cookie settings.

You can manage or change your cookie preferences through the cookie settings on my website.

You can read more about how Wix handles personal information in the [Wix Privacy Policy](#) and [about Wix and data protection](#).