

PEMBROKESHIRE COUNSELLING SERVICE (PCS)

CLIENT PRIVACY NOTICE

Our contact details:

Phone Number: 01437 768708

E-mail: contact@pembrokeshirecounsellingservice.org

Website: www.pembrokeshirecounsellingservice.org

When we provide our counselling service to a client, they are likely to provide a significant amount of personal information to us.

Client personal information, and what we can and cannot do with it, is protected by law and in particular the Data Protection Act 2018 and the UK General Data Processing Regulation ("GDPR").

The principles of the law require that the personal information we collect from a client is;

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- kept accurately and for no longer than is necessary
- processed securely and protected against unauthorised, or unlawful, use or accidental loss

The type of personal information we collect and process concerning clients

We collect and process the following personal information from clients:

- Direct personal identifiers, contact details and characteristics (for example name, address, email address, telephone number)

We may also collect and process other personal information from clients such as;

- date of birth, gender
- family details, lifestyle and social circumstances, financial, employment and education details
- restricted mobility and/or disability,
- their ability to drive
- their registered GP surgery

We may also collect and process Special Category and Criminal Offence Data from clients which is personal information that needs more protection because it is sensitive. This may include, for example, information;

- revealing gender identity, racial or ethnic origin, political opinions, religious or philosophical beliefs
- concerning physical or mental health, sex life and sexual orientation
- concerning legal offences and alleged legal offences.

How we get the personal information and why we have it

The personal information we process is provided to us directly by the client.

We use the information that the client has given us in order to;

- provide professional counselling services to the client
- maintain our accounts and records, promote our services and obtain funding, and to support and manage our personnel. All personal identifiers are removed from client information before such use.

Who we may share personal information with

We may share personal information with other organisations or individuals but only if;

- we have the client's explicit consent to do so, or
- where disclosure is necessary to safeguard the client or others, or
- we are required to do so by law

PCS may store personal information under appropriate password and/or encryption protection on cloud services but only where those services are GDPR compliant and a contractual agreement exists to that effect.

The Lawful Basis for collecting and processing client personal information

Under the law we must identify the lawful basis in GDPR Article 6 that permits us to collect and process the personal information of clients. The lawful basis is that the collection and processing is necessary to prepare and fulfill the Counselling Contract with the client to provide professional counselling services (GDPR Art. 6b).

Under the law we must also identify the specific lawful basis in GDPR Article 9 that, in addition to the Counselling Contract under GDPR Art. 6b, permits us to collect and process special category data and data relating to legal offences. The lawful basis we rely on for this is that of legal claims (GDPR Art. 9(2)f).

How and for how long we store a client's personal information

Client personal information is securely stored. The confidentiality of personal information is important to us.

Records that contain client personal information are either stored in locked secure cabinets or, if stored digitally, password protected and/or encrypted. PCS may store personal information under appropriate password and/or encryption protection on cloud services but only where those services are GDPR compliant and a contractual agreement exists to that effect.

Client counselling records are destroyed seven years from the date of the final counselling session, by shredding or secure deletion software. For those clients to whom a Counselling Contract is or becomes inappropriate, records are destroyed within three months from the date when that is the case.

The client's data protection rights

Under data protection law, the client has rights under the Lawful Basis set out above in respect of their personal information including:

- the right of access – to ask us for copies of personal information that we hold concerning the client
- the right to ask us to rectify personal information which the client thinks is inaccurate or incomplete
- the right to ask us to erase the client's personal information in certain circumstances.
- the right to ask us to restrict the processing of the client's personal information in certain circumstances.
- the right to ask that we transfer the personal information the client has given us to another organisation, or to the client, in certain circumstances.

The client is not required to pay any charge for exercising their rights.

If a client wishes to exercise one or more of their rights, they should contact us using the telephone number or email address at the top of this Notice. If a request is made in respect of these rights, we have one month to respond.

How to complain

If a client has any concerns about our use of their personal information, or wishes to make a complaint, please contact us using the telephone number or email address at the top of this Notice.

Pembrokeshire Counselling Service is registered as a Data Controller at the **Information Commissioner's Office (ICO)** under reference **Z3225578**.

A client can also complain to the ICO if they are unhappy with how we have used their 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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