

# PRIVACY POLICY

ICO REGISTRATION: ZA194174

## 1. Data Controller

This privacy policy explains how the data controller, Luminopex Limited (Company No. 10181354), trading as Claire Debney | Counselling & Coaching, collects, uses, stores, and protects your personal data in accordance with the UK General Data Protection Regulation (GDPR), Data Protection Act 2018 and Data (Use and Access) Act 2025.

## 2. What information I collect, use, and why

When you enquire about counselling, coaching, or my consulting services, I collect information such as your name and contact details so I can respond to you and arrange appointments.

If you decide to work with me, I collect information that is relevant to providing my services safely and appropriately. This may include:

- your contact details and date of birth;
- emergency contact and next-of-kin details;
- information about your health, circumstances and care needs;
- information about previous counselling or therapy and any current medication;
- information about your presenting concerns, goals and wellbeing, including information relating to risk, self-harm or suicidal thoughts where relevant;
- GP details where relevant;
- information you provide during counselling or coaching sessions and in correspondence with me; and
- payment and transaction information.

I only collect and use information that is necessary for these purposes

## 3. Why I process your data – “lawful basis” and “special category information”

I process your personal information where this is necessary to provide counselling, coaching or related services to you.

For ordinary personal information, my lawful basis for processing is Article 6(1)(b) of the UK GDPR: processing is necessary for the performance of a contract with you, or to take steps at your request before entering into a contract.

Some of the information I process, such as information about your physical or mental health, is special category data under the UK GDPR. Where I process this information as part of providing counselling, I rely on Article 9(2)(h): health or social care, together with Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018.

I only collect and use special category information where it is relevant and necessary for the purposes described in this Privacy Policy. I also comply with my professional duties of confidentiality and the requirements of UK data protection law.

#### 4. Confidentiality and disclosure

Information shared during the Services is confidential. There are limited exceptions to confidentiality where I believe there is a serious risk of harm to you or others, in cases of safeguarding children or vulnerable adults, or where I am legally required to disclose information. Our Working Agreement explains these exceptions further.

#### 5. Who I share information with

I only share personal information where this is necessary for the purposes described in this Privacy Policy, where you have asked me to do so, or where I am legally required or permitted to do so.

##### Service providers

I use selected third-party service providers to operate my practice. These providers may process personal information in connection with the services they provide to my practice. Where they process personal information on my behalf, appropriate data protection arrangements are in place.

These providers process personal information on my behalf where necessary to provide their services to me. They include:

- **Mindcare AS (Konfidens):** practice management, client records, session notes, appointments and related services.
- **Google Workspace:** business email and related services.
- **Xero:** accounting and financial record-keeping.
- **Payment service providers and financial institutions:** to process and administer payments.

##### Professional and other services

I may share relevant information with my professional supervisors where this is necessary for professional supervision. I will minimise the information shared and anonymise it where reasonably possible.

I may also share information with professional advisers, such as my accountant, where necessary for them to provide services to me.

##### Safeguarding, emergencies and legal requirements

Where necessary and appropriate, I may share information with healthcare professionals, emergency services, safeguarding services or other relevant organisations where there is a serious risk of harm, a safeguarding concern, or where I am legally required or permitted to disclose information.

I may also disclose information where necessary to establish, exercise or defend legal claims.

## 6. Data retention

I retain your counselling and coaching records securely for seven years after our work together ends. This reflects my professional, insurance and legal responsibilities, including the need to retain records for potential complaints or claims. Where a longer period is required by law, professional requirements or my insurer, I will retain the records for the longer period.

If, following an enquiry or initial consultation, you decide not to proceed with counselling or coaching, I will delete your information when I no longer need it for any legitimate purpose.

## 7. How your data is stored

I use secure electronic systems to store and manage personal information. Client records, session notes, and appointment information are held in Konfidens, my practice management platform, provided by Mindcare AS. Email correspondence is handled through Google Workspace. Payment and accounting information may also be processed through the relevant payment and accounting systems I use.

I use appropriate technical and organisational measures to protect personal information against unauthorised access, loss or disclosure, including password or passkey protection and security measures on the devices I use to access client information.

## 8. Your data protection rights

You have rights in relation to the personal information I hold about you. These include:

- **Right of access:** you can request a copy of the personal information I hold about you.
- **Right to rectification:** you can ask me to correct inaccurate or incomplete information.
- **Right to erasure:** in certain circumstances, you can ask me to delete your personal information.
- **Right to restrict processing:** in certain circumstances, you can ask me to restrict how I use your personal information.
- **Right to object:** in certain circumstances, you can object to my processing of your personal information.
- **Right to data portability:** where applicable, you can ask to receive personal information you have provided to me in a structured, commonly used and machine-readable format.

These rights are subject to certain legal conditions and exemptions. If you wish to exercise any of these rights, please contact me at [claire@clairedebney.com](mailto:claire@clairedebney.com).

## 9. How to complain

If you have a complaint about my services or the way I have handled your personal information, please contact me at [claire@clairedebney.com](mailto:claire@clairedebney.com)

Further information about how I handle complaints is set out in my Complaints Policy.

If your complaint concerns the handling of your personal information and you are not satisfied with my response, you have the right to complain to the Information Commissioner's Office (ICO).