

## **Privacy Policy for Bateren Therapy Ltd**

### **Privacy Policy**

Bateren Therapy Ltd is committed to protecting personal data and handling it lawfully, fairly and transparently. This privacy policy explains how personal data may be collected and used through the website [[www.naomibaterentherapy.com](https://www.naomibaterentherapy.com)] (<https://www.naomibaterentherapy.com>) and in connection with psychotherapy services provided online and in person.

### **Who is responsible for your data**

Bateren Therapy Ltd is the data controller for the personal data covered by this policy, which means it decides how and why personal data is processed.

- Registered office address: Bateren Therapy Ltd, Level One, Basecamp, 49 Jamaica St, Liverpool, Merseyside, L1 0AH
- Company number: 17106698
- Contact email for privacy queries: [hello@naomibaterentherapy.com](mailto:hello@naomibaterentherapy.com)
- Contact telephone number: 07864821243
- ICO registration number: ZC126160

### **What information may be collected**

Depending on how someone uses the website or engages in therapy services, the following categories of personal data may be collected:

- Identity and contact details, such as name, email address, phone number and postal address.
- Enquiry information submitted through a contact form, email or telephone, including details shared when requesting an appointment.
- Therapy administration information, such as appointment dates, attendance, payment status, invoices and correspondence.[
- Health and special category data relevant to psychotherapy services, including information about mental health, wellbeing, family or relationship circumstances, risk, medications, GP details or emergency contact details where appropriate.
- Session notes and clinical records created as part of providing psychotherapy.
- Technical website data, such as IP address, browser type, device information, cookies and analytics data, where the website uses those tools.

### **How personal data is collected**

Personal data may be collected directly when someone:

- completes a website contact form
- emails or telephones the practice
- books or attends an initial consultation or therapy session
- makes a payment

- signs a therapy agreement or provides intake information
- uses the website, where cookies or analytics are enabled.

Information may also be received from a third party where the individual has asked that person or organisation to make a referral or introduction, or where services are funded by a third party and limited administrative data needs to be exchanged.

### **Why personal data is used**

Personal data may be used to:

- respond to enquiries and arrange initial consultations or appointments.
- provide psychotherapy services online and in person.
- maintain clinical records and session notes that support safe, ethical and effective practice.
- communicate about appointments, cancellations, rescheduling, fees and service updates.
- process payments and maintain financial records.[
- comply with professional, legal, safeguarding, insurance, tax, accounting and regulatory obligations.
- maintain website security and understand website usage, where relevant tools are in place.

### **Lawful bases for processing**

Under UK GDPR, personal data may be processed on one or more of the following lawful bases, depending on the situation:

- **\*\*Legitimate interests\*\***: managing enquiries, bookings, routine administration, practice management and website operation, where those interests are not overridden by the individual's rights and interests.
- **\*\*Contract\*\***: taking steps before entering into a therapy contract and performing that contract once therapy services are agreed.
- **\*\*Legal obligation\*\***: keeping records required for tax, accounting, insurance, safeguarding or other legal and regulatory purposes.
- **\*\*Consent\*\***: where consent is specifically requested, for example in relation to non-essential cookies or certain optional communications.
- **\*\*Vital interests\*\***: where it is necessary to protect someone's life or prevent serious harm in an emergency.

Because psychotherapy involves health information, special category data may also be processed where necessary for the provision of health or social care, the management of health care systems or services, safeguarding, establishing or defending legal claims, or with explicit consent where that is the appropriate condition.

### **Confidentiality and limits to confidentiality**

Confidentiality is a core part of psychotherapy practice, and personal information shared in therapy is treated with care and respect.

However, confidentiality is not always absolute. Information may need to be shared where there is a serious risk of harm to the individual or another person, where there are safeguarding concerns involving a child or vulnerable adult, where disclosure is required by law or court order, or where disclosure is necessary for legal, ethical or insurance reasons.

Where possible, any such disclosure would normally be discussed with the client first unless doing so would increase risk or is not legally permitted.

### **Supervision and professional support**

As part of ethical psychotherapy practice, aspects of clinical work may be discussed in professional supervision. Identifiable information should be limited as far as possible, and supervisors are expected to treat information confidentially.

### **Online therapy and communications**

Where therapy is provided online, video platform providers, email services, cloud storage providers or practice management systems may process personal data on behalf of the company. Those providers should be selected with appropriate security measures in place, but no internet transmission or electronic storage system can be guaranteed to be completely secure.

Clients should avoid using shared devices or insecure email accounts for sensitive communications where possible.

### **Sharing personal data**

Personal data is not sold. Personal data may be shared only where necessary and appropriate with:

- clinical supervisors, using the minimum necessary information where possible
- accountants, bookkeepers or payment processors for billing and tax administration
- IT, website hosting, email, cloud storage, telehealth, practice management or security providers who support the business
- insurers, legal advisers or professional bodies where necessary to obtain advice, handle complaints or defend legal claims
- GPs, other healthcare professionals or emergency contacts where the client has agreed, or where there is another lawful basis or urgent safeguarding justification
- HMRC, the ICO, courts, law enforcement, regulators or safeguarding authorities where disclosure is legally required or justified

Where third-party processors are used, they should only process personal data on instructions and with appropriate safeguards in place.

### **International transfers**

Some technology providers may store or access personal data outside the UK. Where that happens, appropriate safeguards should be used in accordance with UK data protection law, such as adequacy regulations or approved contractual safeguards.

### **Data retention**

Personal data should not be kept for longer than necessary, but some records may need to be retained for clinical, insurance, complaint-handling, tax or legal reasons.

- General enquiries that do not lead to therapy: up to 12 months.
- Client therapy records and session notes: 7 years after therapy ends, or longer where clinically or legally appropriate.
- Financial and tax records: typically 6 years from the end of the relevant financial year, or as otherwise legally required.

At the end of the retention period, personal data should be securely deleted, destroyed or anonymised.

### **Data security**

Appropriate technical and organisational measures should be used to protect personal data against unauthorised access, loss, misuse, alteration or disclosure. These measures may include password protection, encryption where appropriate, secure devices, restricted access, secure storage, and locked storage for any paper records.

### **Cookies and website analytics**

The website may use cookies or similar technologies to ensure the site works properly, improve user experience, analyse traffic and support embedded content or third-party services. If non-essential cookies are used, users should be given clear information and, where required, a choice to accept or reject them.

A separate cookie notice or cookie banner may be appropriate depending on the website tools in use.

### **Individual rights**

Under UK data protection law, individuals may have the right to:

- request access to their personal data
- request correction of inaccurate or incomplete data
- request erasure in some circumstances
- request restriction of processing in some circumstances
- object to certain processing based on legitimate interests
- request data portability in some cases
- withdraw consent where processing relies on consent
- complain to the Information Commissioner's Office (ICO) if they believe their data has been handled unlawfully

These rights are not absolute and may be limited where legal exemptions apply, including where records must be kept for legal, regulatory or public interest reasons.

### **How to make a privacy request or complaint**

Requests relating to personal data should be sent to: [hello@naomibaterentherapy.com](mailto:hello@naomibaterentherapy.com).

Individuals also have the right to complain to the ICO, the UK data protection regulator. Information about complaints is available on the ICO website at [\[ico.org.uk\]](https://ico.org.uk/)(<https://ico.org.uk/>).

Should you have a complaint about the conduct of Naomi Bateren, which either we have been unable to resolve to your satisfaction or which you believe is so serious you wish to escalate to the professional body, you can contact the Health & Care Professions Council (HCPC) on +44 (0)20 7840 9814 or via <https://www.hcpc-uk.org/concerns/raising-concerns/>

### **Children and young people**

If services are offered to children or young people, this policy should be read alongside the practice's consent, parental responsibility and confidentiality arrangements, which should explain how personal data will be handled in that context.

### **Changes to this policy**

This privacy policy may be updated from time to time to reflect legal, regulatory, professional or operational changes. The latest version should always be published on the website with its effective date.