

### 1. Introduction

Your privacy is of top priority to me. I am committed to always being a good custodian of your personal information, handling it in a responsible manner, and securing it with industry standard administrative, technical and physical safeguards.

I follow two guiding principles when it comes to your privacy:

- **transparency** - I work hard to be transparent about what personal information I collect and process about you.
- **simplicity** - I try to use easy-to-understand language to describe our privacy practices to help you make informed choices

### About Les Best Counselling (LBC)

LBC is the data controller.

If you have any queries about this privacy notice or about any aspect of our data management, please contact me at [les@lesbestcounselling.co.uk](mailto:les@lesbestcounselling.co.uk)

I will update this privacy notice regularly to ensure it continues to comply with the latest regulations and best practice. This privacy notice was last amended as of the date below.

### 2. How I use your information

#### a) Storage and management of personal information

My data management system is paper based as required by my insurers and held in secure storage. This simplifies my responsibilities for data retention and subject access requests.

#### b) Visitors to my website and social media platforms

When someone visits the website I use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. I do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. I do not make, and do not allow Google to make, any attempt to find out the identities of those visiting the website.

I use Google Analytics so that I can continually improve my service to you.

Like most websites it uses cookies to help the site work more efficiently.

If you fill in a form on my website, your data is stored securely behind the site which is protected by an SSL Certificate.

Where I provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information should you disclose your personal data to them. You are encouraged to read the privacy notices on all other websites you visit.

Non-members can sign up to the website in order to order journals or to book onto events. When doing this you will only be asked for your name and email address. This information will be kept confidential and will not be shared with any third party.

LBC has a presence on various social media platforms. If you engage with me via these platforms I will not usually collect or store your personal data. Where I am collecting personal data for future use, I will let you know and provide you with details about the intended use. I have a presence on Facebook and LinkedIn. To find out how these companies use your data and how you can control the way they use your data please refer to their privacy policies, which should be available on their websites.

I will not pass on your information to a third party to use in their own direct marketing without your consent.

### Sharing your information

During your contact with me I will tell you how your information will be used and that it may be necessary to share it with other services and organisations.

I will not share your information with any third parties unless:

- you have consented to this (for example by providing information to me after I have told you that I will supply the information to a third party)
- it is as part of my duty to protect a child, a vulnerable adult, yourself or the public
- for the prevention and detection of a crime or the assessment of any tax or duty
- I am required to do so by any court or law or any relevant regulatory authority
- for example for the purposes of fraud protection

When you make a payment to me, I use a third-party processor to manage the process and the direct debit payments.

## 3. Audit and regulatory requirements

I may share any data about my operations with:

- HMRC
- Companies House

## 4. Complaints and queries

I try to meet the highest standards when collecting and using personal information, and take any complaints about this very seriously. I encourage you to let me know if you think that collection or use of information is unfair, misleading or inappropriate. I also welcome any suggestions for improving procedures.

This privacy notice does not provide exhaustive details of all aspects of my collection and use of personal information. However, I am happy to provide any additional information or explanation needed. Please send any requests for this to me at – [les@lesbestcounselling.co.uk](mailto:les@lesbestcounselling.co.uk)

If you want to make a complaint about the way I have processed your personal information, you can contact the ICO as the statutory body which oversees data protection law - see [ICO concerns](#).

## 5. Your rights

### Access to your information

I try to be as open as possible in terms of giving people access to their personal information. You can find out if I hold any personal information about you by making a 'subject access request' under GDPR. If I do hold information about you, I will:

- give you a description of it
- tell you why I am holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form

If you agree, I will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

Please be aware that I may withhold information from you or provide you with redacted documents in line with exemptions in appropriate legislation.

### Correcting mistakes

You can ask me to correct any mistakes in any factual information I hold about you, such as your address, date of birth, contact details etc.

### Erasure

The GDPR also gives you the right to have the data I hold about you deleted in some circumstances. This is called the 'right to erasure' or the 'right to be forgotten'. The right applies in the following circumstances:

- I no longer need your data
- You originally provided consent and have now withdrawn consent
- You have objected to the use of your data and your interests outweigh mine
- I have collected your data unlawfully
- I have a legal obligation to erase your data

### Making a request

If you would like to exercise your above rights, please contact me at [les@lesbestcounselling.co.uk](mailto:les@lesbestcounselling.co.uk) with details of your request.

## 6. Disclosure of personal information

In most circumstances I will not disclose personal data without consent, but there are circumstances where I may have to do so. The list below provides some scenarios in which I may disclose personal data. Please be aware that this is not a complete list but serves as an example.

Risk of Suicide.

Risk of harm to yourself or others.

Child protection and the Protection of Vulnerable Adults.

Acts of Terrorism.

Selling of Drugs or Human Trafficking.

Money Laundering.

**Driving Offences** If the police require information of an offence I must provide it

I will only share information that I consider to be necessary and proportionate.

## 7. Data security

I recognise that the information you provide may be sensitive and I will respect your privacy. This means I store it securely and no-one else has access to it. I sometimes share personal data with third parties where I have contracted them to carry out specific tasks for me. In such cases I have carefully selected which partners I work with. I take great care to ensure that I have a contract with the third party that states what they are allowed to do with the data I share with them.

I am committed to holding all personal data within LBC securely. I keep any paper-based personal data in locked cabinets to which only I have access.