



Kirsteen Greenholm

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## Data Protection and Privacy Policy

### 1. Overview

Any data provided by you to Kirsteen Greenholm through any means (verbal, written, in electronic form, or by your use of her website) will be held and processed in accordance with the data protection principles set out in the Data Protection Act 2018 (the UK's implementation of GDPR - General Data Protection Regulation).

Your data will be used for the purposes for which you have given consent, to provide the professional services you have requested from Kirsteen, and to meet the legitimate interests of her work.

This policy only applies to data collected by Kirsteen, and via her own forms and website. Third party agents, and websites which are linked to hers, are not covered by this policy. If you have any queries concerning your personal information or any questions about her use of the information, please contact Kirsteen.

### 2. Website Cookies

When you use Kirsteen's website you will be asked whether you consent to the use of cookies and similar technologies. Most of the cookies used by the site are considered essential to ensure smooth, stable and secure website functionality (for a list of these, please see Appendix 1).

Kirsteen's website also uses Google Analytics, providing Kirsteen with aggregated, anonymized website traffic analysis<sup>1</sup> which helps her to improve her website. The Google Analytics cookies collect information

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<sup>1</sup> In order to track your session usage, Google drops a cookie (`_ga`) with a randomly-generated ClientID in your browser. This ID is anonymized and contains no identifiable information like email, phone number, name, etc. The site also sends Google your IP Address. It uses GA to track aggregated website behaviour, such as what pages you looked at, for how long, and so on. This information is important for improving the user experience and determining site effectiveness. If you would like Kirsteen to delete any GA data - please delete your `_ga` cookies, email Kirsteen on [kirsteen.greenholm@icloud.com](mailto:kirsteen.greenholm@icloud.com), and/or install the Google Analytics Opt-Out Browser Add-On.

in a way that does not directly identify anyone. Google Inc's own privacy policy<sup>2</sup> is available on its website.

### **3. Optional mailing list**

If you choose to sign up to Kirsteen's mailing list, your name and address will be held on Kirsteen's website for marketing purposes (emails giving information about events/services which Kirsteen offers). Wix, as website provider, collates the mailing list, and the information is held subject to Wix Privacy Policies<sup>3</sup>. You can unsubscribe from Kirsteen's mailing list at any time, by selecting the 'unsubscribe' button on emails sent through this medium, or contacting Kirsteen directly.

### **4. Psychotherapy, eco-therapy, supervision and/or training**

When you request psychotherapy, eco-therapy, supervision or training with Kirsteen, or otherwise provide your personal details to her as part of her work as a psychotherapist, supervisor and trainer, you will be asked to consent in writing to her processing of your data under the terms of this statement.

#### **i) What information does Kirsteen collect?**

##### **Psychotherapy, eco-therapy, supervision and training requests**

Contacting Kirsteen to request access to her psychotherapy, supervision and training services can be done online, on paper or by phone. This involves providing your name, a means of contact, and your availability. This may also include information about your therapeutic/supervisory/training needs and history.

##### **Initial discussions**

At any initial discussion, Kirsteen will ask about your current personal, social, professional, financial and medical circumstances. She may also ask about your background and family history as well as the issues which are affecting you now. She requires this information so that she can determine the suitability of gestalt psychotherapy, supervision or training with her, for you.

##### **Psychotherapy and eco-therapy work**

If you agree to work together, Kirsteen will ask you to complete a written contract which she will discuss with you. This normally includes giving your name, date of birth, address, telephone numbers, email address, postal address, GP details, medication details, medical/psychiatric history, history of counselling/psychotherapy and an emergency contact. Kirsteen may also keep records of ongoing work, appointments, attendance and payments. She may ask for your bank details in the event of needing to refund any payments e.g. for a cancelled session.

##### **Supervision and training work**

If you agree to work together, Kirsteen will ask you to complete a written contract which she will discuss with you. This normally includes giving your name, date of birth, address, telephone number(s), email

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<sup>2</sup> <https://policies.google.com/privacy?hl=en-US>

<sup>3</sup> <https://www.wix.com/about/privacy>

address, postal address and an emergency contact. It may also include giving information about: your background; qualifications; professional experience; accreditation status; current and previous therapy and supervision; work situation; professional insurance; permission to work with vulnerable people; professional memberships; an overview of your client work, and details of your professional will. Kirsteen may also keep records of ongoing work, appointments, attendance and payments. Kirsteen may ask for your bank details in the event of needing to refund any payments e.g. for a cancelled session.

## ii) What does Kirsteen use your information for?

- To provide clients with a professional psychotherapy, eco-therapy, supervision or training service
- To schedule and hold appointments, including on Zoom, Facetime or WhatsApp where appropriate
- To notify you about changes to your appointments or other changes to services
- To seek feedback from you on your experience of working with Kirsteen
- To administer psychotherapy, supervision and training services, including arranging sessions, records of the work, financial control, data analysis, research and statistical purposes.
- For Kirsteen's optional online mailing list, information is used to promote psychotherapy, supervision and training-related events Kirsteen is facilitating.
- Anonymised aggregated website analytic information is used to improve the website (see p1, website cookies)

## iii) What information does Kirsteen share?

Kirsteen will not share any personal information about you with other organisations or people, except in the following situations:

- **Consent:** Kirsteen may share your information with others whom you have requested or agreed she can contact.
- **Serious harm:** Kirsteen may share your information with the relevant authorities if she has reason to believe that this may prevent serious harm being caused to you or another person.
- **Compliance with law:** Kirsteen may share your information where she is required to by law or by the regulations and other rules to which she is subject.
- **Clinical supervision:** it is a professional requirement for psychotherapists to review their work with a supervisor, who is also bound by confidentiality.
- **Executors:** In the event of her serious incapacity or death, her appointed professional executors will access your details to contact you to advise you of events, and consider options for future supports if you require them. These executors are psychotherapists and are bound by professional confidentiality.
- **IT backups.** As part of the backups of encrypted data processed and held by professional IT security companies.

## **5. How does Kirsteen keep your information safe?**

All information you provide to Kirsteen is stored as securely as possible. All paper forms and correspondence are kept in locked filing cabinets. All electronic records are stored on her computer, access to which requires password-protected authentication, or by reputable service providers using secure encrypted Internet 'cloud' technology. Kirsteen may also hold your data on her secure smartphone.

Unfortunately, the transmission of information via the Internet is never completely secure. Although Kirsteen will do her best to protect your information using industry-standard applications, protocols and encryption, she cannot guarantee the security of data transmitted to her electronically, including forms completed on her website, emails or communications by text. Any transmission is at your own risk. Once she has received your information, she will use strict procedures and security features to try to prevent unauthorised access.

Your identifiable personal information is kept separately from any session notes and other descriptive material. Client notes and other documentation are destroyed seven years after the end of psychotherapy, supervision or training.

## **6. Your rights**

You have the right to ask Kirsteen to provide a copy of the information held in her records. You also have the right to require Kirsteen to correct any inaccuracies in your information. If you would like to do this, please contact Kirsteen. Any inaccuracies will be amended promptly.

You may wish to request changes to how certain aspects of your information are stored – please contact Kirsteen. You may withdraw your consent for Kirsteen to hold and process your data at any time. However, if you do this while engaging in psychotherapy, supervision or training with Kirsteen, your work with her would have to end. You can withdraw your consent by contacting Kirsteen.

## **7. Changes to this policy**

Kirsteen may edit this policy from time to time, so please review it frequently. Changes and clarifications will take effect immediately upon posting this on the website. If Kirsteen makes any substantial changes she will notify current clients, trainees and supervisees in writing.

Kirsteen Greenholm  
November 2020

## Appendix One

Cookie Name	Purpose	Duration	Cookie Type
XSRF-TOKEN	Used for security reasons	Session	Essential
hs	Used for security reasons	Session	Essential
svSession	Used in connection with user login	2 years	Essential
SSR-caching	Used to indicate the system from which the site was rendered	1 minute	Essential
_wixCIDX	Used for system monitoring/debugging	3 months	Essential
_wix_browser_sess	Used for system monitoring/debugging	session	Essential
consent-policy	Used for cookie banner parameters	12 months	Essential
smSession	Used to identify logged in site members	Session	Essential
TS*	Used for security and anti-fraud reasons	Session	Essential
bSession	Used for system effectiveness measurement	30 minutes	Essential
fedops.logger.sessionId	Used for stability/effectiveness measurement	12 months	Essential
wixLanguage	Used on multilingual websites to save user language preference	12 months	Functional