



## Phoenix Hypnotherapy - Privacy Policy

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### Statement of Intent

This policy sets out how Phoenix Hypnotherapy uses and protects the information you provide when using my services and accessing this and associated and related social media platforms and websites. I intend to ensure any data you provide is kept secure, managed respectfully and only used for the purposes for which it has been provided. This policy will be updated periodically in line with current legislation.

When you contact me via my website, social media, phone or email I will initially collect: Name, telephone contact number, email address (if via email) along with any information you choose to supply regarding the purpose of your enquiry.

### How is this information used?

I use this information in order to make contact with you to discuss your requirements. I may also use this information so that I may improve my services. If you choose to proceed with making an appointment to see me, I will send you a copy of this Privacy Policy so that you are aware in advance how I will use information provided in the course of our sessions together. You will also be sent a copy of my Client Agreement and Social Media Policy.

I will ask you at your appointment to consent to treatment and agree to terms and conditions.

Due to GDPR 2018 regulations I will also require you to consent to this policy.

### Information gathered at therapeutic sessions.

Information gathered during therapeutic sessions will not be stored by electronic means but will remain as manual handwritten documents. These will be stored safely and securely at my private address. You do not have to consent to the collection of information, however, if you choose not to provide it, I may not be able to work with you.

Information required at the session will include your home address, contact details, GP contact details and some basic health and lifestyle information: there are some conditions



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that are contra-indicated for hypnotherapy and sometimes there are circumstances where it may be necessary to contact your GP before commencing therapy. I will inform you of this at our appointment should this appear appropriate.

Further information gathered at the session will include issues worked with and techniques and approaches utilised. This is to enable continuation and to improve efficacy of the sessions.

Your email address will be used for the purposes of sending you written advice, homework tasks and audio recordings to work with as part of the therapy. It may also be necessary to send emails or texts to confirm or rearrange appointments. I will make a note of information you provide me in order that we can plan bespoke therapy sessions and identify/produce scripts which will be used in session and/or which can be sent to you to listen to between sessions.

### Contact information:

Email: [info@phoenixhypno.co.uk](mailto:info@phoenixhypno.co.uk)

Website: [www.phoenixhypno.co.uk](http://www.phoenixhypno.co.uk)

5 Corsair Close, Lee-on-the Solent, Hampshire, PO13 8GF

Tel: 07899 883866

Phoenix Hypnotherapy Ltd trading as Phoenix Hypnotherapy is a limited company, registered in England and Wales/Scotland/Northern Ireland. Company Number - 11514944

The Data Controller and Processor is David Hall

### The lawful basis for processing data

The basis on which we keep data is that of "Legitimate Interests". This means that the data is necessary for us to fulfil the objectives of Phoenix Hypnotherapy and that it is data that would reasonably be expected for us to hold and use.



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### Data

The data we hold includes:

Client information as provided on the paper forms required for treatment.

### Sharing

Data is shared in the following situations:

- With the client if they request to see their personal record.
- Our accountant will see bank, credit card and Paypal records which will contain any information that is submitted when making payment. If asked we will redact identifiable data before sending to the accountants.
- The data is primarily used to enable us to provide the service(s) that we have been engaged to provide. It may also be used for scientific research purposes and statistical purposes.

### Details of where data is held:

- Any emails are held either on our computer's hard drive or if archived in Google Drive which is secure cloud based storage which is itself GDPR compliant.
- Credit card information is shredded as soon as processed.
- Standing order mandates are shredded and/or deleted as soon as payments start to come through.
- If you use Paypal, standing orders or online banking then clearly these systems will hold data. We will download from these systems for accounting purposes and the resulting spreadsheets are held in a secure file. When sent to our accountants, they will be password protected.



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- Email addresses are held within our email processing software which is GDPR compliant.
- Client data is kept for 7 years. After this time any paper records are shredded and computer records permanently deleted.

### Security

We take the security of data seriously and as such:

- All data is held securely (see details of where data is held above)
- Any sensitive data transmitted is sent encrypted where possible
- For accounting purposes Excel spreadsheets are used
- However, we are not in control of data (including emails) which are sent to us.
- If there is any breach of data security, we give full details to the Information Commissioner's Office and any person affected within 72 hours of the breach and do all possible to minimise any potential impact.

### Rights

Clients have rights with regards to the data held:

- The right of access. We will provide all data we hold on you as soon as we can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).
- The right to rectification. If any data we hold is incorrect, we will correct it as soon as we can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness).
- The right to erasure. If a client requests their data to be erased we will delete any computer records and shred any paper records as soon as we can following a request (and definitely within 30 days, unless this is impossible due to holidays or illness). Data may be retained for scientific research, historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing but this would never include data such as address/email/phone.



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- The right to restrict processing. This would usually be a stop-gap measure before correction of any errors or before erasure
- The right to data portability. This might apply if a client wants notes sent to another therapist for example, but it is likely that the easiest solution would come under the right to access, i.e. we would send the data to the client.

The right to object to: Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling). We do not engage in these things. Clients can opt-out at any time.

Any requests pertaining to the above should be submitted in writing to the Data Controller, David Hall at 5 Corsair Close, Lee-on-the Solent, Hampshire, PO13 8GF

### Website Privacy Policy

This is detailed on our website and can be accessed at the following link:

<https://www.phoenixhypno.co.uk/privacy-policy/>

Date adopted 13 May 2018

Date for revision December 2020