



MB Therapy

Person-Centred Counselling

Privacy & Data Protection

Client Data Protection Policy

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Introduction

I am committed to protecting your personal data and respecting your privacy. This policy explains how I collect, use, store, and protect your personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Data Controller

For the purposes of data protection legislation, I (Michael Boulton) am the **Data Controller** responsible for your personal data.

What Personal Data I Collect

I may collect and process the following types of personal data:

- Personal details such as name, address, email address, telephone number, and date of birth
- Emergency contact details
- GP details (where relevant and with your consent)
- Session notes and clinical records
- Correspondence via email, text message, or telephone
- Payment and invoicing records (please note I do not store full card details)

How Your Data Is Collected

Your personal data may be collected through:

- Initial enquiries and contact forms
- Assessment forms and contracts
- Counselling sessions
- Email, telephone, or text communication
- Online booking or payment systems

Lawful Basis for Processing

Under UK GDPR, I process your personal data on the following lawful bases:

- **Contract** – to provide counselling services agreed with you
- **Legal obligation** – to comply with legal and professional requirements
- **Legitimate interests** – to manage my practice appropriately
- **Consent** – for processing special category data such as counselling notes

You may withdraw your consent at any time; however, this may affect my ability to continue providing services.

How Your Data Is Used

Your personal data is used to:

- Provide counselling services
- Communicate with you about appointments and sessions
- Maintain accurate clinical records
- Process payments and maintain financial records
- Ensure your safety and comply with safeguarding responsibilities

How Your Data Is Stored and Protected

I take appropriate technical and organisational measures to protect your data, including:

- Secure, password-protected electronic records
- Encrypted devices and secure cloud storage where applicable
- Locked storage for any paper records
- Access restricted to myself only

I will not share your data with third parties without your consent, unless there is a legal or ethical requirement to do so.

Confidentiality and Data Sharing

Your information is treated as confidential. However, confidentiality may be broken in the following circumstances:

- Where there is a risk of serious harm to you or others
- Where disclosure is required by law (e.g. court order)
- For safeguarding concerns involving children or vulnerable adults
- For clinical supervision (data is anonymised wherever possible)

Data Retention

I retain personal data only for as long as necessary and in line with professional and legal requirements. Typically:

- Counselling records are retained for **at least 7 years** after the end of therapy
- Records relating to children and young people are retained until **7 years after they reach the age of 18**
- Financial records are retained for **7 years** in accordance with HMRC requirements

After this period, data is securely deleted or destroyed.

Your Rights Under UK GDPR

You have the right to:

- Access the personal data I hold about you
- Request correction of inaccurate or incomplete data
- Request erasure of your data (where applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)

Further information can be found at: www.ico.org.uk

Data Breaches

In the unlikely event of a data breach that poses a risk to your rights and freedoms, I will notify you and the ICO in accordance with legal requirements.

Changes to This Policy

This policy may be updated from time to time to reflect changes in legislation or practice. The most recent version will always be available on my website.

Contact

If you have any questions or concerns about this policy or how your data is handled, please contact me using the details provided on my website.