



# Privacy notice

## Fair Processing, GDPR and data retention notice

Your privacy is a top priority. We're 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.

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

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

is registered as a data controller with the Information Commissioner's Office (ICO) registered number ZA450266.

## Why is my data being requested?

We collect data in order to carry out a contract selection and award process.

- What information does Adintra collect? We will collect information about: personal and employment details (name, address, contact details), employer, GP and other professional services involved in your care / support, personal financial information – for payment and invoicing purposes, personal history and presenting issues, this may include information of a sensitive personal nature.

## How is my information kept secure and how long is it kept for?

Adintra has technical and operational measures in place to ensure the safe and secure storage of personal data.

Adintra operates to be compliant with the GDPR. We use secure networks for the electronic transfer of data. Application data is kept in accordance with the data retention schedule. After that all data is destroyed securely.

## What are my rights?

You have the right to request to access personal information Adintra holds about you and to request that Adintra rectifies any incorrect information held about you.

If you would like to make such a request, please notify us in writing for the attention of the Data Lead to the address below and allow 30 days for a response.

If you have a concern about the personal data collected or the way in which it was collected, you can raise this with the Information Commissioners Office. Their website is [www.ico.org.uk](http://www.ico.org.uk)

### **How adintra uses your information**

I will keep brief personal notes in line with BACP and HCP council recommendations which will be securely stored either in a locked cabinet, electronically password protected, or in an encrypted high security authentication client management system.

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- I will store and dispose of your information in accordance with the ICO and my Professional Ethical Framework. I keep your session notes, assessment and contact details so that I can carry out our sessions confidently and professionally, these are shredded after 6 years of us no longer working together.
- During your contact with adintra, we'll tell you how your information will be used and if it may be necessary to share it with other services and organisations.
- I do have some electronic details as we communicate by email and phone, however I delete these regularly. Should there ever be a breach of confidentiality or privacy I will notify the ICO (Information Commissions Office) and follow their guidance for data breaches.
- My ICO registration number is: ZA450266 it is not permissible to publicise the content of our exchanges or share them with a third party.
- I do not wear any voice activated devices during my counselling practice either in room or online, nor do I have any voice activated devices nearby and the microphone function on my mobile phones is set to the off position.
- If someone makes a complaint to BACP data will be processed in accordance with the "Professional conduct procedure" this information will be retained by BACP for 6 years, this information is to show what action BACP has taken and to protect BACP against any potential legal claims. Please be aware that BACP are unlikely to delete information you have provided and processed as part of a complaint. General complaints data is likely to be shared with any individual related to the complaint, where appropriate. This includes staff members, managers, witnesses etc. It will be used to investigate the complaint and to take any action deemed appropriate as a result of the investigations.

### **Who will Adintra share my information with?**

- We will not pass on your information to a third party without your consent.

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

- you have consented to this (for example by providing information to us after we've told you that we will supply the information to a third party)
- it is as part of our 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
- we are required to do so by any court or law or any relevant regulatory authority
- to protect the rights, property or safety of Adintra
- we transfer our rights and duties to provide services to another person for example in my professional will

### **Visitors to the Adintra website and social media platforms**

The Adintra website is hosted by WIX a web design and hosting service. When someone visits the Adintra website, wix places cookies - small pieces of data stored on a site visitor's browser, typically used to keep track of the settings users have selected and actions they have taken on a site. Adintra has added a cookies consent / decline banner to the homepage for visitors to select their own cookie preferences. You can access further information about WIX cookie policy here [Cookies and Your Wix Site | Help Center | Wix.com](#)

Wix uses Google Analytics, to collect standard internet log information and details of visitor numbers and interactions on the website. This information is only processed in a way that does not identify anyone. You - read the [Google Analytics privacy notice](#).

Adintra provides links to other websites such as BACP and the Awyr Las charity donation page, we encourage you to read the privacy notices on their websites if you visit them.

### **Social media**

Adintra has a presence on various social media platforms. If you engage with Adintra via these platforms we will not usually collect or store your personal data. Where we are collecting personal data for future use, we will let you know and provide you with details about the intended use. We 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.

### **Adintra premises**

Adintra has an annual lease agreement at Eirianfa community centre Denbigh. Eirianfa has closed circuit TV in the shared public area of the building. This is a purely internal system that is used to help maintain personal safety and security. Video recordings are kept securely on-site and only shared with police when they are needed to investigate a crime. Only staff who have appropriate authority are allowed access to the recordings. The recordings are kept for 30 days.

We record the name of all visitors to our offices for fire safety reasons. The information is disposed of at the end of each working week

## Retention and disposal schedule

### Document Version History

- Copies of documents relating to course content and delivery will be retained / updated as required

### Purpose

The aim of the retention and disposal schedule is to outline appropriate ways of managing retention of information. GDPR legislation establishes 7 core principles of good data protection and a responsibility to ensure compliance with these principles;

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability.

### Information lifecycle

- **Creation/Capture:** Information is created or captured for a specific reason.
- **Current:** Current information is being used for its original purpose in relation to why it was collected. The length of time the information is in a current state varies depending on what the information was collected for
- **Semi Current:** Information at this point is no longer in regular use and is being retained for legislative or business needs
- **Disposal:** Once information has reached the end of its retention period; they are reviewed to see whether they are still required and if not, they are destroyed.

### Disposal

All information will be disposed of appropriately in line with the retention schedule. The organisation does not hold any information permanently.

### Responsibility

The responsibility to comply with the retention and disposal schedule applies to all staff and must always be conformed to. Retention should always be considered throughout the information lifecycle and any new capture of information needs to consider the possible retention rules required.

## Schedule

Emails and text messages or other digital communications  
Digital communications should be retained for 12 months. It is important that information we want to keep as a record, is saved to shared spaces, to provide evidence of decisions made or action taken.

| Description                | Retain for / until  | Action  | Retention reason  | Person responsible |
|----------------------------|---|---|---|--------------------|
| Emails / text messages     | Emails and other digital communication should be retained for 12 months | Emails and text messages should be retained for 12 months thereafter be automatically deleted / destroyed.  | It is important that I retain your information and communication after therapy ends should you wish to return or have cause to request information held.            | SC                 |
| Notes / record of sessions | Six years   | Retain in accordance with GDPR regulation for 6 years, after which information will be destroyed / deleted. | This information is retained for this period as this is the duration of time in which it is possible that a client may raise a complaint with my professional body. | SC                 |