

REFLECTIONS COUNSELLING LTD GDPR POLICY



Your Rights:

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018), you have rights as a data subject which you can exercise in relation to the information we hold about you. You can read more about these rights on the [ICO's website](#)

Access to Your Information:

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

- give you a description of it
- tell you why we are 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, we 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 we may withhold information from you or provide you with redacted documents in line with exemptions in appropriate legislation.

Records of Treatment:

If you have received therapy from us and require access to information about your treatment, you will need to contact us directly.

Correcting Mistakes:

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

Erasure:

The UK GDPR also gives you the right to have the data we 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:

- we 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- You originally provided consent and have now withdrawn consent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 ours
- we have collected your data unlawfully
- we have a legal obligation to erase your data

Making a Request:

If you would like to exercise your above rights, please contact us at wendy@reflections-counselling-kent.co.uk with details of your request. Please note that details of your request, correspondence and a copy of any information disclosed will be held by us and this information will be used as evidence we have met our legal obligations.

Disclosure of Personal Information:

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

- we will share personal data with external legal professionals if we need legal advice.
- we may share personal data with law enforcement agencies or government departments where appropriate.

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

Data Security:

We recognise that the information you provide may be sensitive and we will respect your privacy. This means we store it securely and control who has access to it. We sometimes share personal data with third parties such as GP's but only when permission has been granted. We take great care to ensure that we have a contract with the third party that states what they are allowed to do with the data we share with them.

We will only share personal data with other organisations where we are satisfied that the other organisation is entitled to receive it. Where relevant, we carry out due diligence checks on other organisations and ensure we have appropriate data protection agreements in place.

We are committed to holding all personal data on secure systems. We keep any paper-based personal data in locked cabinets to which only we have access. We are working to reduce the amount of paper-based information we hold as it is easier to secure data if it is only held electronically. The majority of personal data is held electronically on our system that is hosted by [Microsoft](#)

We use third-party processors to provide email monitoring and filtering.

We have invested extensively in ensuring our information systems are secure.

Wendy Boorman (Director)

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