



DR ANNA C SICILIA, CLINICAL PSYCHOLOGIST
**PSYCHOLOGY
BRIGHTON**
PSYCHOLOGICAL THERAPIES & SERVICES

PRIVACY POLICY

Dr Anna Chiara Sicilia, Director

PSYCHOLOGY BRIGHTON LTD 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ,
United Kingdom

PRIVACY POLICY

How your personal information is collected, stored and processed

The Data Protection Act 1998 and General Data Protection Regulation 2018 set out the framework for data protection law in the UK. This document explains how Psychology Brighton Ltd will use any personal data collected about you, as a past, present, or future client, or when using the website, in line with the General Data Protection Regulation (GDPR).

This Privacy Policy applies to www.psychologybrighton.com, and Psychology Brighton Ltd and governs data collection and usage. For the purpose of this Privacy Policy, unless otherwise noted, all references to Psychology Brighton Ltd include www.psychologybrighton.com.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions and Therapy Contract, which are available upon request.

Psychology Brighton Ltd is committed to protecting your privacy in accordance with the Data Protection Act and the GDPR 2018. We will not use any information we may hold about you for any purpose other than that for which it was collected. For GDPR purposes, Dr Anna Chiara Sicilia, Director, is the data controller.

Please read this privacy policy carefully.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

| | |
|----------------------|--|
| Data | collectively all information that you submit to Psychology Brighton Ltd via the Website and during the delivery of the services provided by Psychology Brighton Ltd. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws; |
| Personal Data | Any information relating to an identified or identifiable natural person ("data subject"), who can be identified or who are identifiable, directly from the information in question; or |

| | |
|--|--|
| | who can be indirectly identified from that information in combination with other information. |
| Special Category Data | Personal data that needs more protection because it is sensitive. This can include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, data concerning a person's sex life and sexual orientation. |
| Consent | Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The person must have capacity to consent to a specific decision. |
| Data subject | Individual to whom personal data relates. |
| Cookies | a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies); |
| Data Protection Laws | any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK; |
| GDPR | the General Data Protection Regulation (EU) 2016/679; |
| Psychology Brighton Ltd, we or us | Psychology Brighton Ltd, a company incorporated with registered number 13184220 whose registered office is at 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom |

| | |
|---------------------------------|--|
| UK and EU Cookie Law | the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011; |
| User or you | any third party that accesses the Website and is not either (i) employed by Psychology Brighton Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Psychology Brighton Ltd and accessing the Website in connection with the provision of such services; and |
| Website | the website that you are currently using, www.psychologybrighton.com , and any sub-domains of this site unless expressly excluded by their own terms and conditions. |

2. In this privacy policy, unless the context requires a different interpretation:
- a. the singular includes the plural and vice versa;
 - b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
 - c. a reference to a person includes firms, companies, government entities, trusts and partnerships;
 - d. "including" is understood to mean "including without limitation";
 - e. reference to any statutory provision includes any modification or amendment of it;
 - f. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

3. This privacy policy applies only to the actions of Psychology Brighton Ltd and Users with respect to this Website and services offered by Psychology Brighton

Ltd. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

4. For purposes of the applicable Data Protection Laws, Dr Anna Chiara Sicilia, Chartered Clinical Psychologist and Director is the "data controller". This means that Dr Anna Chiara Sicilia determines the purposes for which, and the manner in which, your Data is processed.

How we collect Data

5. We collect Data in the following ways:

- a. data is given to us by you; and
- b. data is collected automatically.

Data that is given to us by you

6. Psychology Brighton Ltd will collect your Data in a number of ways:
 - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
 - b. when you register with us and set up an account to receive our products/services;
 - c. when you make payments to us, through this Website or otherwise;
 - d. when you elect to receive marketing communications from us;
 - e. when you use our services;
 - f. during the process of therapy;

in each case, in accordance with this privacy policy.

Data gathered during the process of therapy

7. Upon starting therapy, basic personal information will be collected for contact and identification purposes (e.g. your name and contact number or email).
8. During the process of therapy, notes will be taken by the therapist to ensure that an accurate record of the sessions is kept in order to provide you with an

appropriate and adequate service. These notes will include personal and sensitive detail about your life and will not be shared with anyone else unless it is for the reasons outlined in the Confidentiality section below.

9. Session notes are stored on a secure electronic notes system with password protection.

Session recordings and notes

10. On occasions, our therapists may audio record the therapy sessions for the purpose of clinical supervision. The therapist will only do this with your explicit consent and this data will not form part of your client record.
11. Therapy sessions come with an expectation of mutual privacy and respect. Recording a therapy session without the therapist consent is not permitted under any circumstances. Should you wish to record your therapy sessions, you can discuss this with your therapist and obtain their consent prior to the recording taking place. We reserve our right to terminate a therapy agreement, should we have reason to believe that you are recording sessions covertly. We reserve our right to report any breaches to the relevant authorities and seek remedial action where appropriate.
12. Your therapist will record all contacts that you have with them. This will include telephone, email and letter contacts and all documentation associated with your contact (e.g. therapeutic letters and/or reports). This data is used solely for the delivery of a psychological therapy service to you and to ensure that our therapists meet their professional and legal obligations.
13. If you are referred by your health insurance provider, your therapist will also collect and process personal data provided by that organisation. This includes:
 - a. basic contact information;
 - b. referral information;
 - c. health insurance policy number;
 - d. authorisation for psychological treatment.

Data that is collected automatically

14. To the extent that you access the Website, we will collect your Data automatically, for example:
 - a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and

navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.

- b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".
 - c. Our website is linked with a third-party service called Google Analytics, to collect standard internet log information and details of visitor patterns when using the website. This information is processed in a way that will not identify you. Under no circumstance will we make or allow Google to make any attempts to find out the identity of our website visitors.
15. By visiting our website, you are deemed to have agreed to clause 12 (Section – Data that is collected automatically) of this privacy policy.

Our use of Data

16. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website and our Services. Specifically, Data may be used by us for the following reasons:
- a. internal record keeping;
 - b. improvement of our products / services;
 - c. to provide you with the services requested;

in each case, in accordance with this privacy policy.

17. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
18. When you register with us and set up an account to receive our services, the legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
19. In order to provide psychological services, it is necessary for us to process your personal data. Under the GDPR it is necessary to identify a lawful

basis for processing this information. The lawful basis in this case is that it is in our **legitimate interest** to do so.

20. In addition, there may also be occasions when the processing of your information may be required due to a **legal obligation**, for us to be able to comply with the law, for example in the case of a litigation claim or when there is a court order.
21. The data collected about you will include special category data (for example data concerning your health, sexual orientation). We are required to process this data for the purpose of providing you with the psychological treatment you have requested.
22. There may be occasions when it may also be necessary for us to process your personal and special category data due to **vital interests**, in order to protect your life or the life of another adult or child. We will make every attempt to discuss this with you and gain your consent. However, there may be occasions when you are physically or legally unable to provide consent.

Confidentiality

23. Personal data will be kept confidential between you and your therapist, in the context of therapy sessions and will not routinely be shared with third party without your explicit consent.
24. We are occasionally asked by clients, their solicitors, the police and the courts for access to the client's records. The records our therapists keep are not suitable to be used as evidence in legal proceedings. We therefore reserve the right to resist legal requests to produce the records in court. We do this in order to fulfil our duty of confidentiality to our clients.
25. There are some situations when we may be required to share your data with a third party:
 - a. If you are referred by your health insurance provider, or otherwise claiming through a health insurance policy to fund therapy, we will share appointment schedules with that organisation for the purposes of billing. Some insurance companies may also require details about any diagnosis, treatment plan, progress updates and a treatment summary. Your therapist will discuss this with you prior to any disclosure and will only share information with your explicit written consent. It is completely up to you what information your therapist releases. It is within your rights to not give consent for this information to be released. However, please note that if you do not release the information required, most insurance companies may refuse to fund your treatment.

- b. Occasionally our therapists may be asked by clients or by external agencies such as Social Services or the NHS to write reports on the progress made in psychological therapy. Our duty of confidentiality means that we are not in a position to do this without your explicit written consent. Therefore, any such requests will be discussed with you in the first instance and information will only be shared if we have your explicit consent to do so.
 - c. we will only agree to participate in information sharing with your written informed consent and when it is our professional opinion that it is in a client's best interest.
26. In exceptional circumstances, we may need to share personal information with relevant authorities, without your explicit consent:
- a. If we feel you or someone else is at risk of significant harm. We will aim to discuss this with you before disclosing information to third party. However, if the risk is imminent, we may not be able to discuss this with you before sharing information with third party. We have a duty of care for you and members of the public. If there is cause for concern for your safety or the safety of someone else (e.g. someone close to you or a member of the public), we may seek consultation with another professional, such as your GP the NHS or other statutory services.
 - b. If there is a court order in place, concerns over child protection and information regarding fraud, drug trafficking, acts of terrorism and other unlawful acts. We have a legal obligation to report this to authorities.
27. We will attempt to discuss this with you prior to any disclosure. However, there may be occasions when we will be unable to discuss the disclosure with you (e.g. If it is in our professional opinion that disclosing this information to you may increase the level of risk to yourself or someone else and/or may not be in your best interest).

Supervision

28. Clinical psychologists are required to have regular and on-going supervision, in line with the Health and Care Professions Council (HCPC) standards of proficiency. Regular supervision is essential for reviewing and monitoring a psychologist's work and gain new perspectives on the therapeutic work undertaken.

Keeping Data secure

29. We will use technical and organisational measures to safeguard your Data, for example:
- access to your account is controlled by a password and a user name that is unique to you.
 - we store your Data on secure servers.
 - Paper notes / records will be stored in a locked filing cabinet. Electronic records (e.g. reports / letters) are stored on a secure storage system. All documents will be password protected and passwords will be changed at regular intervals.
 - Any email correspondence or correspondence via the website will also be stored as part of your electronic clinical record, as outlined in clause 13(c).
 - Your contact details (name, mobile number and email address) will be stored on our electronic records and will not be stored on any mobile phones, although we use company mobile phones to make contact with you.
 - payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).
30. There may be occasions when your therapist may record a therapy session, with your consent, for the purpose of clinical supervision. These recordings will be stored on a password protected recording device and will be transferred on a secure electronic data storage system after the session. All recordings will be permanently deleted, following use in clinical supervision session or within 90 days from the date of the session. Recordings will not form part of your client record and will be stored separately.
31. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: dr.anna.sicilia@gmail.com.
32. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

33. We take your privacy very seriously. All the data we process is held in the United Kingdom. We do not store personal data outside of the EU. All data storage services we use for the purpose of our business are fully GDPR compliant. Malware and antivirus protection is installed on all computers used for business purposes. Mobile devices are encrypted and protected with a passcode/fingerprint scanner and antivirus software is installed on all mobile devices.
34. If you require personal / sensitive information to be shared with you or third party, this will usually be done electronically. Sensitive data will be sent to clients or third party as relevant in an email attachment, which will be password protected. The password will be sent in a separate email. Our email provider is GDPR compliant. We advise clients to ensure that their email provider is also GDPR compliant to minimise the risk of a data breach.
35. We will under no circumstance use open or unsecure Wi-Fi networks to send personal and/or sensitive data electronically.

Data retention

36. Your personal information will be kept for the duration of the therapy process. After the therapy contract terminates, your data will be stored for a period of 7 years (data retention period) from your last appointment with your therapist, to comply with our contractual and legal obligations. In the case of a child under the age of 13, any records will be kept for 7 years after they reach the age of 18. All personal data will be permanently destroyed at the end of the calendar year in which the data retention period ends.
37. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

Your rights

38. You have the following rights in relation to your Data:
- Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

- b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
 - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
 - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
 - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
 - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
39. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: dr.anna.sicilia@gmail.com.
40. If you are not satisfied with the way we process your data, you can make a complaint directly to us or you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
41. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it (e.g. any change of address, name, personal information).

Right to complain

42. If you have any feedback about the service you receive from Psychology Brighton Ltd, or you wish to make a complaint, please do not hesitate to contact us directly. We welcome feedback from our clients and will try our best to resolve your complaint and will always take it seriously, as it allows us to improve the service that we offer.
43. If you have reason to believe that we have not complied with data protection laws, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).
44. If you have a complaint or concern about our therapists' professional practice, you can also contact The British Psychological Society and The Health and Care Professions Council.

Links to other websites

45. Our website (www.psychologybrighton.com) may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

Cookies

46. This Website may place and access certain Cookies on your computer. Psychology Brighton Ltd uses Cookies to improve your experience of using the Website and to improve our range of products and services. Psychology Brighton Ltd have carefully chosen these Cookies and have taken steps to ensure that your privacy is protected and respected at all times.
47. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
48. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Psychology Brighton Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
49. This Website may place the following Cookies:
- 50.

| Type of Cookie | Purpose |
|----------------------------|--|
| Strictly necessary cookies | These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. |
| Functionality cookies | These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). |

51. You can find a list of Cookies that we use in the Cookies Schedule.
52. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
53. You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
54. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.
55. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

General

56. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
57. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
58. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
59. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

60. Psychology Brighton Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed

to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact Dr Anna Chiara Sicilia, Director at Psychology Brighton Ltd by email at dr.anna.sicilia@gmail.com.

Attribution

61. This privacy policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (<https://www.rocketlawyer.com/gb/en>). 23 April 2021

Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary

We use the following strictly necessary cookies:

| Description of Cookie | Purpose |
|-----------------------|--|
| ForceFlashSite | When viewing a mobile site (old mobile under m.domain.com) it will force the server to display the non-mobile version and avoid redirecting to the mobile site |
| hs | Security |
| smSession | Identifies logged in site members |
| XSRF-TOKEN | Security |

Functionality

We use the following functionality cookies:

| Description of Cookie | Purpose |
|-----------------------|--|
| svSession | Identifies unique visitors and tracks a visitor's sessions on a site |
| SSR-caching | Indicates how a site was rendered. |
| smSession | Identifies logged in site members |