

# Counselling with Lucy Privacy Policy

## Counselling with Lucy

Last updated: 05.07.26

### 1. Who I am

I'm Lucy Bello, a BACP-registered integrative counsellor and psychotherapist trading as Counselling with Lucy ("I", "me"). I provide online counselling and psychotherapy services to individuals and couples across the UK, delivered remotely via Konfidens and Zoom.

For the purposes of UK data protection law (the UK GDPR and the Data Protection Act 2018) and, where applicable, the EU General Data Protection Regulation (EU GDPR), I am the data controller for the personal data described in this policy.

As I work entirely online, I don't publish a postal business address on this website. You can request my correspondence address, and full details of my BACP registration number, in your therapy contract, which is provided before any paid sessions begin.

Contact:

- Email: [lucy@counsellingwithlucy.co.uk](mailto:lucy@counsellingwithlucy.co.uk)
- Phone: +44 7787 283895

### 2. What this policy covers

This policy explains how I collect, use, store, and protect personal data when you:

- visit this website,
- contact me by email, phone, or the website's contact/enquiry form,
- subscribe to my mailing list,
- book a session through my booking platform, or
- become a client and take part in therapy sessions.

It should be read alongside my separate Cookie Policy, which explains how cookies and similar technologies are used on this site.

### 3. Personal data I collect

#### Website visitors and enquirers

- Name, email address, and phone number, if you contact me directly or via a form.
- Any details you choose to include in a message or enquiry.

#### Mailing list subscribers

- Email address, and any name you provide when subscribing.

#### Prospective and current clients (booking)

- Name, email address, and phone number, and appointment scheduling details, collected through my third-party booking platform, Konfidens.
- Konfidens processes this information on my behalf as a data processor. Please also refer to Konfidens' own privacy policy for how they handle booking data.

### Therapy clients

- Special category data (health data) relating to your mental health, wellbeing, and any other sensitive information you share in the course of therapy, including clinical/session notes.
- Emergency contact details, if provided.
- Payment information necessary to process session fees (I don't store full card details myself; these are handled by my payment provider).

I don't knowingly collect information from anyone under 18. My services are aimed at adults.

## 4. How and why I use your data, and my lawful basis

Purpose	Data used	Lawful basis (UK/EU GDPR)
Responding to enquiries	Name, email, phone, message content	Legitimate interests (Art. 6(1)(f)) – responding to prospective clients
Sending mailing list emails	Email, name	Consent (Art. 6(1)(a)) – you opt in and can withdraw consent at any time
Booking and managing appointments	Name, email, phone, appointment details	Performance of a contract / steps prior to entering a contract (Art. 6(1)(b))
Providing therapy, keeping clinical records	Special category health data	Explicit consent (Art. 9(2)(a)) and/or provision of health/social care treatment by a professional subject to confidentiality obligations (Art. 9(2)(h))
Invoicing and payment	Contact and payment details	Performance of a contract (Art. 6(1)(b)); legal obligation for accounting records (Art. 6(1)(c))
Complying with professional and legal obligations	Clinical and contact records	Legal obligation (Art. 6(1)(c)) and legitimate interests – meeting BACP Ethical Framework requirements

## 5. Confidentiality of therapy content

What you share in sessions is treated as confidential in line with the BACP Ethical Framework for the Counselling Professions. Limits to confidentiality (for example, risk of serious harm to yourself or others, or a legal requirement to disclose) are explained in your therapy contract, which you'll receive and agree to before starting paid sessions.

I receive regular clinical supervision, which is a professional requirement. Anything discussed in supervision is anonymised or de-identified wherever possible, and my supervisor is also bound by confidentiality obligations.

## 6. Who I share your data with

I share personal data only where necessary, with:

- Konfidens (booking platform) – to manage scheduling, appointment reminders and online sessions
- Zoom – to deliver online sessions. Zoom may process data outside the UK/EEA; see section 8.
- Wix.com – my website host and email marketing/ mailing list provider.
- My clinical supervisor – for professional supervision, using anonymised or minimal identifying detail.
- My accountant/bookkeeper, if applicable, for invoicing and tax purposes.
- Professional, legal, or regulatory bodies (such as BACP), or the emergency services/other authorities, where I'm required or permitted to disclose information, e.g. in a safeguarding situation or by court order.

I don't sell your personal data, and I don't share it with third parties for their own marketing purposes.

## 7. International data transfers

Some of the providers I use (such as Zoom and Wix) may store or process data outside the UK and European Economic Area (EEA). Where this happens, I rely on appropriate safeguards, such as the UK International Data Transfer Agreement, the EU Standard Contractual Clauses, or the provider's participation in a recognised data protection framework, to ensure your data continues to receive an appropriate level of protection.

## 8. How long I keep your data

- Enquiries that don't become clients: deleted or anonymised typically within 12 months.
- Mailing list data: retained until you unsubscribe.
- Client records, including clinical notes: retained in line with BACP guidance and my professional indemnity insurance requirements. Exact retention periods are set out in your therapy contract, but as a general guide, clinical records are typically kept for a minimum of several years after the end of therapy (longer for certain categories of client, such as under-18s at the time of therapy, where longer retention may be required).
- Financial/invoicing records: kept for as long as required by HMRC (currently at least 6 years).

## 9. Your rights

Under UK GDPR and, where applicable, EU GDPR, you have the right to:

- be informed about how your data is used (this policy),
- access the personal data I hold about you,
- have inaccurate data corrected,
- request erasure of your data, in certain circumstances,
- restrict or object to certain processing,
- request data portability, where relevant,
- withdraw consent at any time, where processing is based on consent (e.g. mailing list, or aspects of therapy consent),
- complain to a supervisory authority.

To exercise any of these rights, contact me at [lucy@counsellingwithlucy.co.uk](mailto:lucy@counsellingwithlucy.co.uk). Some rights are limited in a therapeutic context – for example, I may need to retain core clinical records even after a deletion request, to meet legal, insurance, or professional obligations, and I'll explain this if it applies to you.

### Supervisory authorities

- UK residents: Information Commissioner's Office (ICO) – [ico.org.uk](http://ico.org.uk), or call 0303 123 1113.
- EU residents: your local data protection authority in the EU member state where you live or work.

## 10. Security

I take reasonable technical and organisational measures to protect your personal data, including secure storage of clinical records, password-protected devices and accounts, and using reputable third-party platforms (Zoom, Wix, Konfidens) that maintain their own security and compliance standards.

## 11. Changes to this policy

I may update this policy from time to time, for example to reflect changes in law or in how I work. The “last updated” date at the top shows when it was last revised. Please check back periodically.

## 12. Contact

If you have questions about this policy or how your data is handled, contact me at:

Email: [lucy@counsellingwithlucy.co.uk](mailto:lucy@counsellingwithlucy.co.uk)

Phone: +44 7787 283895