



Privacy Policy

Introduction

Your privacy is very important to me, and you can be confident that your personal information will be kept safe and secure and will only be used for the purpose it was given to me. I adhere to current data protection legislation, including the General Data Protection Regulation (EU/2016/679) (the GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR) 2003 & the Data Protection and Digital Information Act (DUAA) 2024-26

1. Who I Am

I am **Sam Gouldthorp**, a sole-trader counsellor based in Fareham, UK, operating as **The Mind Sanctuary**. I am the **Data Controller**, responsible for how your personal information is collected, used, and protected.

Contact: Email: themindsanctuary@hotmail.com

Address: Available on request for privacy and safety.

2. The Information I Collect

I collect and process the following types of information:

Information you provide directly

- Name, email address, phone number
- Enquiry details
- Information shared during assessment or therapy
- Emergency contact details
- GP details (optional)

Special category data

As part of counselling, I process sensitive information relating to your mental health, wellbeing, and personal history.

Website and technical data

- IP address
- Browser type
- Pages visited
- Cookie preferences
- Analytics data (non-identifying)
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Payment information

- Transaction records (no card details are stored)

3. Why I Collect Your Information (Lawful Basis)

To respond to enquiries

Legitimate Interests – to communicate with you and manage appointments.

To provide counselling services

Contract – necessary to deliver the service you request.

To process special category data

- **UK GDPR Article 9(2)(h)** – health and social care
- **DPA 2018 Schedule 1, Part 1(2)** – counselling and support services
- **Explicit Consent** – obtained during assessment

To meet legal obligations

- Record-keeping
- Safeguarding
- Tax and accounting

To improve my website

Legitimate Interests – using privacy-focused analytics.

4. How Your Information Is Used

I use your information to:

- Respond to enquiries
- Arrange and manage appointments
- Provide counselling
- Maintain clinical records
- Ensure safety and safeguarding
- Process payments
- Improve my website and services
- Meet legal and professional obligations (e.g., BACP ethical requirements)

I do **not** use your data for marketing.

5. Sharing Your Information

I will not share your information unless:

- You give explicit consent
- I am legally required to (e.g., court order)
- There is a safeguarding concern
- It is necessary for supervision (anonymised)
- It is required for accounting or auditing (minimal data)

I do not sell or trade your information.



6. How Your Information Is Stored

Your information is stored securely using encrypted systems. Digital records are password-protected and backed up securely. Paper notes (if used) are stored in a locked cabinet.

7. How Long I Keep Your Information

- **Adult client records:** 7 years after the end of therapy
- **Enquiry emails:** 12 months
- **Website analytics:** up to 26 months
- **Safeguarding records:** as required by law

8. Your Rights

Under UK GDPR and DUAA, you have the right to:

- Access your data
- Correct inaccurate information
- Request deletion (where appropriate)
- Restrict processing
- Object to processing
- Withdraw consent
- Data portability (where applicable)

You also have the right to raise a **data-protection complaint** (see below).

9. Subject Access Requests (SARs)

DUAA introduces “reasonable and proportionate search” and “stop-the-clock” provisions.

How to make a request

Email: themindsanctuary@hotmail.com

Please state that you are making a **Subject Access Request**.

Timescales

- I will respond within **one month**
- I may pause (“stop the clock”) if I need to verify your identity or clarify your request

Exemptions

I may withhold information if:

- It contains third-party data
- It would cause serious harm
- It relates to safeguarding
- It is legally privileged
- It is part of my own therapy notes that are not appropriate to disclose

10. Data-Protection Complaints Procedure (DUAA Requirement)

If you have concerns about how I handle your data, please contact me:

Email: themindsanctuary@hotmail.com

I will acknowledge your complaint within **30 days** and provide a written response.

If you remain unhappy, you can contact the **Information Commissioner's Office (ICO)**: <https://www.ico.org.uk>

11. Cookies and Website Tracking

My website uses:

Essential cookies

Required for the website to function.

Analytics cookies

Used to understand how visitors use the site. These cookies:

- Do not identify you
- Are used only by me
- Are not shared with third parties for advertising

Marketing cookies

Not used unless you explicitly consent (e.g., Meta Pixel).

You can manage cookies through your browser settings.

12. Third-Party Services I Use

Depending on your setup, this may include:

- Email provider
- Website hosting platform
- Online forms or booking tools
- Payment processors
- Privacy-focused analytics tools
- Encrypted storage services
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All third-party providers are chosen for strong data-protection standards.

13. Children's Information

I do not knowingly collect information from anyone under 18 without parental or guardian consent.

14. Changes to This Policy

This policy will be updated as needed to reflect changes in:

- UK GDPR
- DPA 2018
- PECR
- DUAA (2024–2026 implementation)

The latest version will always be available on my website.

Last updated: June 2026 (DUAA-compliant)



