

Willow & Thyme Therapy

Privacy Policy

Introduction

The Data Controller is Shauna New, trading as Willow & Thyme Therapy, correspondence address Unit 151629, PO Box 7169, Poole, BH15 9EL, Information Commissioner's Office (ICO) registration ZB350306.

Willow & Thyme Therapy ("we," "us," "our") is committed to protecting and respecting your privacy. This policy explains how we collect, use, and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. By visiting our website or using our services, you agree to the collection and use of information in accordance with this Privacy Policy.

Information We Collect

We may collect the following types of personal data:

- Personal Information: Name, contact details (email, phone number), and any details you provide through our contact forms, consultations, or therapy sessions.
- Health Information: Any relevant medical or mental health details you provide for therapy purposes, including personal history, health conditions, and treatment information.
- Payment Information: If applicable, information related to payment for services rendered, which are securely processed by Zanda, Stripe, FreeAgent and Monzo.

How We Use Your Information

We use your personal data to:

- Provide therapy services and ensure quality of care
- Communicate with you regarding appointments, cancellations, and updates
- Process payments and maintain financial records
- Fulfil legal and ethical obligations, including record-keeping requirements and professional supervision

Legal Basis for Processing Your Data

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. You can find out more about lawful bases [here](#). We process your data under the following lawful bases:

- Consent: When you provide clear consent, such as via contact forms, consultations, email, text, or in sessions.
- Contractual Necessity: When processing is required to provide therapy services.
- Legal Obligation: When compliance with legal, regulatory, or professional body requirements is necessary.
- Legitimate Interests: For practice operations, security, and record maintenance.

As we process special category data (health information), we rely on Article 9(2)(h) of UK GDPR: processing is necessary for the provision of health or social care or treatment.



Willow & Thyme Therapy

Data Retention

We retain your personal data for 7 years after your last point of contact in line with the National Counselling and Psychotherapy Society requirements and our professional insurance obligations. Financial records may be kept longer to meet requirements for HMRC and the IRS. Our services are only available to adults aged 18 and over.

Sharing Your Information

We **do not** sell or share your data for marketing. We may share your data with:

- Healthcare Providers & Safeguarding Personnel: When necessary for your care or legal duties
- Legal Authorities: If required by law (e.g., court orders, regulatory obligations)
- Third-party Service Providers: For secure record keeping, payment processing, and IT support
 - Zanda - Comprehensive practice management software
 - Zoom - Telehealth service provided by Zanda
 - Stripe - Credit and debit card processing
 - BizzyAI Refine - Assists in rewriting and refining notes to improve clarity, style, and coherence, but it does not alter the clinical content or make clinical decisions
 - VSee - Back-up telehealth software
 - Monzo - Business bank account
 - FreeAgent - HMRC-compliant accounting software
 - ProtonMail - Secure email provider
 - Webhealer - Web hosting
 - O2 - Business phone number
 - Apple - iCloud file backup

Therapy records are strictly confidential. Any data sharing is considered on a case-by-case basis, ensuring legal and ethical compliance, often in consultation with supervisors, other healthcare professionals, or in collaboration with the client where appropriate and possible.

Data Security

We implement reasonable precautions to prevent the loss, misuse, or alteration of any data you provide. This includes encrypted electronic health records (EHR) and secure storage, secure communication methods for emails and practice management software, and restricted access to personal data within our practice. Some of our third-party service providers may process personal data outside the UK, including handling data in the United States and Switzerland. Where this occurs, we rely on adequacy regulations or Standard Contractual Clauses (SCCs) to ensure appropriate protection.

In the event of a data breach that risks your rights and freedoms, we will consult with a professional supervisor, and notify you and the Information Commissioner's Office (ICO) without undue delay, and where feasible within 72 hours.

Your Rights Under UK GDPR

You can find out more about your data protection rights and the exemptions which may apply [here](#):



Willow & Thyme Therapy

- Right of access: You have the right to ask us for copies of your personal information.
- Right to rectification: You have the right to ask us to correct inaccurate or incomplete data.
- Right to erasure: You have the right to ask us to delete your personal information, subject to legal and ethical obligations.
- Right to restriction of processing: You have the right to ask us to limit how we can use your personal information.
- Right to object to processing: You have the right to object to the processing of your personal data.
- Right to data portability: You have the right to ask that we transfer the personal information you gave us to another organisation.
- Right to withdraw consent: When we use consent as our lawful basis, you have the right to withdraw your consent at any time.

Cookies

Our [website](#) is hosted by WebHealer, which uses cookies to enhance functionality. For more details, visit [WebHealer's Cookie Policy](#). We do not collect cookies in any other capacity.

Use of AI Tools

We do not use AI, automated decision-making, or profiling in our practice to analyse client information or to make decisions about your care. All clinical decisions are made by a qualified therapist.

We may use artificial intelligence (AI) tools in limited ways to support our practice:

- Within our practice management system (Zanda), we may use the 'Refine' service, which refines practitioner-written notes within ethical parameters and suggests grammatical improvements. This service does not alter clinical content and operates within Zanda's secure, GDPR-compliant environment. Zanda does not store or use data to train AI models.
- We may also use AI tools externally for professional development, background research, or to improve the clarity of our written communication. No identifiable client information is ever entered into these external systems. We do not endorse the use of AI as a therapeutic tool. However, we recognise that AI is increasingly present in healthcare and digital culture, and we remain mindful of understanding its potential impacts so that we can better support clients.

External Links

Our website, documents, and other communications may contain links to third-party websites or resources not operated by Willow & Thyme Therapy. We are not responsible for their privacy practices or content, and we encourage you to review their privacy policies.

Contact Us

To make a data protection rights request or if you have any questions about this Privacy Policy, please email shaunanew@wttherapy.co.uk. We will respond without undue delay within one month.

You have the right to complain to the ICO, the UK supervisory authority for data protection. You can contact them at www.ico.org.uk or 0303 123 1113.

