

Hanno Blue Ltd Data Privacy Statement

The information in this document forms part of our agreement for working together. A copy is available on my website – www.hannoblue.com.

Julia Phippard, Hanno Blue Counselling, Hanno Blue and Hanno Blue Ltd are all covered by this agreement for working with clients through psychotherapy, EDMR, coaching, executive coaching and therapeutic coaching services. Information collected will vary depending on the service.

This privacy notice tells you what to expect us to do with your personal information.

Contact details:

Telephone: 07859936518 | **Email:** Julia@hannoblue.com | **Website:** www.hannoblue.com

What information we collect, use, and why:

We may collect and use the following information to provide services:

- Name, address and contact details, including phone number and email address
- Date of birth
- Occupation and company where you work
- Insurance policy details (if through insurance or other relevant details if through a third party such as an Employee Assistance Program Referral)
- The information you choose to share in your enquiry
- GP/medical professionals information
- Information about your personal history, relationships, work, identity, family, circumstances and reasons for seeking support
- Records of meetings and decisions
- Correspondence between us
- Recordings of sessions for training purposes (with advance agreement)

Psychotherapy/therapeutic services:

We also collect the following special category information to provide services. This information is subject to additional protection due to its sensitive nature:

- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, physical health conditions and medication)
- Sexuality and sex life information
- Ethnicity
- Religion
- Other sensitive information which is relevant to our sessions

We will only collect what is ethical and necessary to provide the service you need.

How we use your information:

We use your personal information to:

- Respond to enquiries, arrange initial consultations and communicate with you about sessions
- Provide therapy and coaching services
- Keep appropriate records
- Manage payments and invoices
- Meet legal, professional and ethical responsibilities (working to the professional frameworks from the [British Association for Counselling and Psychotherapy](#) and the [EMCC UK](#))
- Manage risk, safeguarding or emergency situations if necessary
- Maintain insurance, tax and accounting records,
- Respond to data protection requests or complaints

Lawful bases and data protection rights:

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO website: [Information Commission's Office](#).

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website: [What rights do I have over my personal information? | ICO](#):

Under UK GDPR, you have the right to:

- Access the personal data I hold about you (a Subject Access Request)
- Request that inaccurate data is corrected
- Request erasure of your data, subject to my legal and professional retention obligations
- Object to or restrict processing of your data in certain circumstances
- Withdraw consent, where consent is the basis for processing

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice. If you make a request, we must respond to you without undue delay and in any event within one month.

Our lawful bases for the collection and use of your data:

Our lawful bases for collecting or using personal information services are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – where we need to keep or share information to comply with the law.
- Legitimate interests - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Information is collected for the benefit of providing appropriate services entered into via a contract.

- Any recordings are made for the purpose of supporting training - and are explicitly agreed by the client for this purpose.
 - Use of anonymised information to be used as case material for professional development - and are explicitly agreed by the client for this purpose.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from may include:

- Directly from you
- Family members or carers
- Insurance companies/EAP referrals
- Employers/someone at your place of work

Where your information is stored:

- Website/contact form: Wix
- Email: Zoho mail and Microsoft outlook
- Online sessions: GoogleMeet, Doxy or Teams
- Payments: Starling Bank account and PayPal
- Cloud storage: Microsoft One Drive
- Phone/messages: SMS, text, WhatsApp apps

How long we keep information:

Enquiry information is kept for 3 months and deleted thereafter if we decide not to work together.

If we choose to work together then, your electronic and paper record data is kept for 5 years after the date of our last meeting and the information is deleted in the month following this 5 year period. There are times when I may need to keep information for longer periods such as if there is an ongoing safeguarding issue or insurance claim.

For client who visit my address in person, there is a 'Ring' style doorbell on the front of the house. Any recordings are deleted within 3 months.

Duty of confidentiality:

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);

- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

Who we share information with:

Others we share personal information with may include:

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries (for insurance and EAP referrals)
- Emergency services – when there is a risk of serious harm to you or someone else
- Other relevant third parties:
 - Supervisors
 - Clinical will professionals - if I am unavailable in an emergency situation
 - Husband/family member - if I am unavailable in an emergency situation

Use of AI:

We use AI tools for research and general practice administration, writing, planning or generating information.

We never put your personally identifiable information into any AI tools. We may use these tools to help summarise information, e.g. from a 360 feedback process, but any use will be communicated and contracted for, either in advance or at the time.

Couples counselling:

Please be aware that if you are attending as a couple, then any requests for information will need to be discussed with both of you as they are joint records relating to both individuals. I will review any such requests in line with current data protection laws and may provide information which is redacted, summarised or withheld in part.

Please also note that couples notes are created for therapeutic purposes, not for use in court proceedings, custody disputes or as evidence against the other partner.

How to complain:

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: Julia@hannoblue.com

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Last Updated: 26 September 2026