Privacy Policy

Last updated: 19 July 2026

Who I am

I am Mrs Georgina Turner, a qualified counsellor and psychotherapist offering talking therapy and CBT at Not So Typical.

You can contact me at: georgina_turner [at] hotmail.co.uk (please replace [at] with @ when emailing)

I am registered with the Information Commissioner's Office (ICO). My registration number is ZA874425.

What personal data I collect

I collect the following categories of personal data:

- **Name and contact details** — your phone number and email address
- **Date of birth**
- **Postal address**
- **Health and therapy-related information** — including presenting issues and relevant medical history
- **Session notes** — my clinical notes about our work together
- **Payment and invoicing information** — to process payments and maintain financial records
- **GP name and contact details**
- **Emergency contact details**
- **Enquiry details** — information you submit via the contact form on my website

Health and therapy-related information, including details about your mental health, presenting issues, and medical history, is classified as "special category data" under Article 9(1) of the UK GDPR. This means it receives enhanced legal protection, and I take particular care in how I collect, store, and process it.

How I collect your data

I collect personal data directly from you:

- When you first contact me by phone, email, or through my website contact form
- During our initial consultation and intake process
- Throughout our sessions together
- Via email, telephone, or messaging when we communicate between sessions

I do not collect personal data about you from third parties unless you have given explicit consent for this, for example if you ask me to liaise with your GP.

Why I process your data — lawful basis

Under the UK GDPR, I need a lawful basis to process your personal data. I rely on the following:

Article 6 basis (ordinary personal data):

Article 6(1)(b) UK GDPR — processing is necessary for the performance of the therapeutic contract between us. This means I process your data because it is essential to provide you with the treatment you have engaged me for.

Article 9 basis (special category data):

Article 9(2)(h) UK GDPR — processing is necessary for the provision of health or social care treatment by a health professional.

The additional condition required under UK law is set out in the Data Protection Act 2018, Schedule 1, Part 1, paragraph 2 (health or social care purposes). This processing is carried out by me as a qualified counsellor and psychotherapist subject to the professional obligation of confidentiality under the BACP Ethical Framework for the Counselling Professions.

Marketing communications

I offer a mailing list to share updates, resources, and information about my services. Marketing emails are sent only with your consent — this is the lawful basis for marketing, not legitimate interests.

You actively opt in to receive marketing by signing up to my mailing list or ticking a consent box. I will never add you to my mailing list without your clear agreement.

You can withdraw your consent at any time. Every marketing email I send includes an unsubscribe link, or you can simply contact me directly to be removed.

Unsubscribing from marketing will never affect the treatment or service you receive from me.

Even after you unsubscribe from marketing, I may still need to contact you about matters directly relating to your treatment or appointments — this is a separate communication based on our therapeutic contract, not marketing.

Professional obligations and supervision

I am required by my professional body, BACP, to attend regular clinical supervision. This is an essential part of maintaining safe and ethical practice.

When I discuss my therapeutic work with my supervisor:

- Your name and any identifying details are not shared
- I use anonymised or pseudonymised case material only
- My clinical supervisor is a qualified professional bound by the same confidentiality obligations as I am
- My supervisor is bound by their own professional code of ethics and practice

Supervision helps me reflect on my work and ensures you receive the best possible care.

Who I share your data with

I use the following third-party services which may process your personal data:

- **Google Analytics** — website analytics
- **WooCommerce** — order and payment processing
- **WordPress** — website hosting
- **Zoom** — video sessions
- **Calendly** — appointment booking
- **Microsoft OneDrive** — secure file storage
- **Google Drive** — secure file storage
- **WhatsApp** — messaging
- **DocuSign** — electronic document signing
- **MailerLite** — email marketing
- **Microsoft Outlook** — email communication
- **Square** — payment processing

Each of these services is bound by a data processing agreement and publishes its own privacy policy with further detail.

Other parties who may access limited data:

- **My clinical supervisor** — receives anonymised case material only, as described above
- **An external accountant or bookkeeper** — receives invoice data only, for the purpose of managing my accounts and tax obligations

I never sell your personal data to anyone.

International data transfers

The following third-party services I use may transfer personal data outside the United Kingdom:

- Google Analytics (Google LLC, USA)
- WooCommerce (Automattic Inc, USA)
- WordPress (Automattic Inc, USA)
- Zoom (Zoom Video Communications Inc, USA)
- Calendly (Calendly LLC, USA)
- Microsoft OneDrive (Microsoft Corporation, USA)
- Google Drive (Google LLC, USA)
- WhatsApp (Meta Platforms Inc, USA)
- DocuSign (DocuSign Inc, USA)
- MailerLite (MailerLite Limited, Lithuania — may transfer to USA)
- Microsoft Outlook (Microsoft Corporation, USA)
- Square (Block Inc, USA)

Where data is transferred to the USA, I rely on Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) as appropriate safeguards, in accordance with UK GDPR Chapter V and the updated requirements of the Data (Use and Access) Act 2025.

The USA does not currently have a UK adequacy decision. Details of these safeguards are set out in each provider's own privacy documentation.

How long I keep your data

I retain personal data for different periods depending on the type of record and legal requirements:

- **Therapy records (adult clients):** 7 years after our last session, in line with the Limitation Act 1980 and standard professional indemnity insurance requirements
- **Therapy records (clients under 18 at time of therapy):** until the client reaches the age of 25
- **Financial records:** 6 years, as required by HMRC
- **Website enquiries (non-clients):** 12 months

After the applicable retention period ends, electronic records are permanently deleted.

Your rights under UK GDPR

You have the following rights regarding your personal data:

1. **The right to be informed** — to know how I collect and use your data (this policy fulfils that requirement)
2. **The right of access** — to request a copy of the personal data I hold about you. Under the Data (Use and Access) Act 2025, I will conduct a reasonable and proportionate search when responding to your request
3. **The right to rectification** — to ask me to correct any inaccurate or incomplete data

4. **The right to erasure** — to ask me to delete your data. This right is not absolute; I may need to retain records until the end of the applicable retention period where required by professional guidelines, insurance requirements, or law
5. **The right to restrict processing** — to ask me to limit how I use your data in certain circumstances
6. **The right to data portability** — to receive your data in a structured, commonly used format, or to have it transferred to another controller where technically feasible
7. **The right to object** — to object to certain types of processing, including processing based on legitimate interests
8. **Rights related to automated decision-making** — I do not use automated decision-making or profiling in my practice

To exercise any of these rights, please contact me at: georgina_turner [at] hotmail.co.uk (please replace [at] with @ when emailing)

I will respond to your request within one month. There is no fee for most requests.

Data protection complaints — your right under the Data (Use and Access) Act 2025

You have the right to make a data protection complaint directly to me.

You can submit a complaint at: https://notsotypical.policydiary.co.uk (select the "Make a complaint" tab)

Or contact me at: welcome [at] not-so-typical.co.uk (please replace [at] with @ when emailing) I

take all complaints seriously and will respond promptly.

If you are not satisfied with my response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO):

- Website: ico.org.uk
- Telephone: 0303 123 1113
- Address: ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Confidentiality exceptions

Everything you share with me in therapy is confidential. However, there are limited circumstances where I may need to share information without your consent:

- **Risk of serious harm** — if I believe you or someone else is at imminent risk of serious harm
- **Safeguarding concerns** — if I become aware of child abuse or neglect, or concerns about a vulnerable adult
- **Legal requirement** — if ordered to disclose information by a court of law

Wherever possible, I will discuss any breach of confidentiality with you first, unless doing so would itself put someone at risk.

Changes to this policy

I review this policy annually and whenever my practices change. If I make significant changes that affect how I handle your data, I will inform you directly.

You can always find the current version of this policy at: https://notsotypical.policydiary.co.uk