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[www.crossroads-coaching.eu](http://www.crossroads-coaching.eu)



# Privacy Policy

Welcome to **Crossroads Coaching**, a professional counseling and coaching practice. Please find below the Privacy Policy applicable to your contact with Crossroads Coaching.

Privacy of personal information is an important principle to me, Nicole Buitenhuis, owner of and psychologist at Crossroads Coaching. I am committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the services I provide.

My policy is made under the General Data Protection Regulation (GDPR) under EU law (May 25, 2018). My policy as a psychologist to protect your privacy is more stringent than the legislation requires, because of the psychologists' Ethical Code.

## What is Personal Information?

Personal information is information about an identifiable individual. It includes information that relates to:

- personal information: name or given name, family name or surname, address, telephone numbers, date of birth, gender (or preferred identity), age, relationships and children, occupation, telephone/SMS number, email address, video conference ID (if online therapy), GP contact details, school details (for children);
- sensitive information: medical conditions (if relevant), prescribed medication, psychological history and current difficulties, sexuality;
- sensitive personal data: signed therapy client agreement, therapy records (therapist notes, letters, reports and/or outcome measures)
- sensitive financial data: financial information, including bank account details (if you are a private patient).

Personal information is different from business information (e.g., an individual's business address and telephone number). This is not protected by privacy legislation.

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## Purposes for collecting personal information

### For clients

I collect, use and disclose personal information only to provide psychological services to my clients.

Another reason for collecting personal information is to obtain a baseline of health and social information so that I can monitor treatment progress and identify changes that occur over time.

Like other health care practices, I must also collect, use, and disclose information in order to invoice clients for rendered services, or to collect unpaid accounts.

In some situations, I collect personal information to conduct an assessment to provide a professional opinion about an individual's psychological functioning. With the client's informed and written consent, that opinion would be reported to the appropriate person or agency.

### Treatment of minors

When treatment or coaching of a minor is asked for, specific rules with regards to consent and sharing of information will be followed;

- For children up to 18 years old, consent from the parents / guardians is required. Permission of the child is not necessary, but it is entitled to information and their opinion is recorded and taken into account.
- Young people from 18 years of age decide independently and have an independent right to information.

### For members of the general public

For members of the general public, my primary purpose for collecting personal information (e.g., contact phone numbers, email addresses) is to make them aware of the range of psychological services I provide.

## Protecting personal information

I understand the importance of protecting personal information. I have, therefore, taken the following steps:

- Paper information is either under supervision or secured in a locked and restricted area.
- Electronic hardware is either under supervision or secured in a locked and restricted area at all times. Passwords are used on computers and individual files.

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I will use reasonable means to protect the security and confidentiality of email information sent and received. Any email communication sent to me, by way of the website or otherwise, may not be secure. As such, it is advised not to send information that is sensitive or confidential in nature.

## **Confidentiality and limits to the protection of personal information**

Everything that you share with me during our sessions is confidential. No information I obtain about you can be released to anyone without your expressed written consent. However, there are some limits to confidentiality in a psychological practice. These few exceptions are designed to ensure your safety and the safety of the general public. They are as follows:

- if you give me reason to believe that you are at risk of harming yourself or someone else, I have a duty to share whatever information is necessary to ensure that you and/or others are safe.
- if you give me reason to believe that a child is being abused, I have a duty to report that information to the relevant regulating organization.
- if you tell me that you have been sexually abused by a health professional, I have a duty to report that information to the relevant regulating organization for that professional.
- if my records are subpoenaed by the court.

As part of my ongoing professional development, I may consult with other health and mental health professionals about a case. During a consultation, no identifying information about patients is revealed. The other health professionals are also legally bound to keep the information confidential. All consultations will be documented in the clinical file.

## **Retention and destruction of personal information**

I retain personal information for some time to ensure I can answer any questions clients might have about the services provided and for my own accountability to external regulatory bodies. I retain client information for a minimum of 10 years after the last contact, so I can reference the records from previous assessment or treatment services provided for clients who seek services on an ongoing basis.

I destroy electronic information by deleting it and, when the hardware is replaced or discarded, I ensure that the hard drive is physically destroyed. All paper information is destroyed through shredding.

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## Access to your personal information

With only a few exceptions, you have the right to see what personal information I hold about you. Often all you have to do is ask. I will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). I will ask you to confirm your identity before providing you with this access. I reserve the right to charge a nominal fee for such requests and I may ask you to put your request in writing. If I cannot give you access, I will tell you the reason within 30 days of receiving your request.

If you believe there is a mistake in your information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions I may have formed. I may ask you to provide documentation proving that my files are wrong. Where I agree that I made a mistake, I will make the correction and, where appropriate, notify anyone to whom I sent this information. If I do not agree that I have made a mistake, I will agree to include a brief statement from you on the point in your file and, as appropriate, I will forward that statement to anyone else who received the earlier information.

## Questions or concerns?

If you have any questions or concerns, please contact me at [info@crossroads-coaching.eu](mailto:info@crossroads-coaching.eu).