



The Happy Habit GDPR Policy Notice

GDPR Privacy Policy Notice

This notice describes how **The Happy Habit collects, stores, and processes personal data** as part of the therapy services we provide. In accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, we act as a **Data Controller** and are responsible for protecting your personal data.

We are registered with the **Information Commissioner's Office (ICO)** under registration reference **ZC008997**.

We are committed to **protecting your privacy**, ensuring transparency, and only using your data in ways that are **lawful, necessary, and ethical**.

Your Rights

1. Your Rights Under UK GDPR

Under the UK GDPR, you have the following rights:

1. **Right to Access** – You may request a copy of your records at any time. We will provide access within 30 days, free of charge.
2. **Right to Rectification** – You may request corrections to any inaccurate or incomplete information.
3. **Right to Erasure ("Right to be Forgotten")** – You may request deletion of your data unless we have a legal obligation to retain it.
4. **Right to Restrict Processing** – You may request that we limit the use of your data in specific circumstances.
5. **Right to Object to Processing** – You can object to the processing of your personal data for certain reasons.
6. **Right to Data Portability** – If needed, your data can be transferred to another service.
7. **Right to Complain** – If you believe your data rights have been violated, you can lodge a complaint with the ICO.
8. **Right to Withdraw Consent** – You can withdraw consent for data processing unless we have a legal basis to continue.

9. **Right to Be Informed About Automated Decision-Making** – If we use any automated decision-making systems, you will be informed.
10. **Right to Notification of Data Changes** – If your data is rectified, erased, or restricted, you have the right to be notified.

For more information or to exercise your rights, please contact us at grace@thehappyhabit.co.uk.

Data Collection, Processing & Legal Basis

2. What Data We Collect and How We Use It

Category	What We Collect	Purpose	Legal Basis
Contact Information	Name, email, phone number, address, emergency contact	To provide therapy services and communicate securely	Contractual necessity and consent
Medical Information	Biopsychosocial history, risk assessments, medical history, therapy progress notes	To provide appropriate therapy and safeguard well-being	Explicit consent and vital interest
Financial Information	Payment details (no card data stored), invoices, records of payments	To process payments for therapy sessions	Contractual necessity
Cookies & Website Data	IP address, browsing data, analytics	To improve website functionality and security	Legitimate interest and consent
Correspondence Records	Emails, messages, notes of discussions	To maintain service quality and comply with legal obligations	Legitimate interest and contractual necessity
Marketing Information	Name, email, phone number (only if opted-in)	To inform you about relevant services	Consent

We do not share your data with third parties for marketing purposes.

Disclosure, Data Storage and Retention

3. Data Retention: How Long We Keep Your Data

We store personal data securely for the following durations, in accordance with legal and ethical guidelines:

- **Client Contact & Financial Information:** Stored for 7 years after your last session.
- **Medical Information:** Stored for 8 years from your last session, or until your 25th birthday (if under 18).
- **Marketing Information:** Stored for up to 7 years or until you opt out.
- **Website Analytics (Cookies):** Retained as per our Cookie Policy.

We regularly review data to ensure it remains accurate and necessary. If it is no longer needed, we securely delete or anonymise it.

4. Confidentiality & Data Sharing

We do **not** share your data with **third parties** except in the following **limited and legally justified cases**:

1. **With Your Explicit Consent** – If you agree to a referral or information-sharing with another professional.
2. **Risk of Harm** – If we believe there is **immediate risk** to your safety or another person's safety, we may contact
 - Emergency services
 - Your GP or emergency contact
3. **Supervision** – We discuss cases in a **confidential, anonymised manner** in clinical supervision to maintain professional standards.
4. **Legal & Regulatory Requirements**– We may disclose data if:
 - Required by law (e.g., court order, safeguarding concerns).
 - Requested by your **health insurance provider** for claim purposes.
 - Necessary for fraud prevention or protecting rights and safety.
5. **Clinical Will Provision**– In the event of unforeseen circumstances affecting your therapist (e.g., illness, death), a trusted professional will:
 - Notify clients
 - Securely manage and destroy data as per UK GDPR.

We take all necessary steps to **minimise data sharing** and will inform you whenever possible.

5. Third-Party Services

Our website may contain links to **external websites** (e.g., professional networks, payment providers). We are **not responsible** for their privacy practices. Please review their privacy policies separately.

What happens if there is a data breach?

6. Data Security Measures

We implement strong technical and organisational measures to protect your data, including:

- **Data Encryption:** All stored data is encrypted.
- **Firewall Protection:** Secure servers protect data storage.
- **Limited Access Controls:** Only authorised personnel can access client records.
- **Secure Deletion:** When data is no longer needed, we securely erase it.
- **Regular Backups:** To prevent data loss in case of system failures.

Despite these measures, no system is 100% secure. If a data breach occurs, we will:

- **Notify the ICO within 72 hours** if required.
- **Inform you without undue delay** if there is a risk to your rights or freedoms.

7. Changes to this privacy policy

We may update this policy to reflect legal changes or service updates. Updates will be:

- Posted on our website.
- Communicated to clients when significant changes occur.

Last Updated: 5 February 2026