GVB Psychotherapy Privacy Notice

Data controller Gregory van Beurden trading as GVB Psychotherapy | Updated 24 October 2026 | Version 2.4

This notice explains what personal information I collect, why I use it, who may receive it, how long I keep it, and the rights available to you. Protecting confidentiality is part of the therapeutic relationship, but data protection law also requires me to describe the necessary uses of information outside the therapy room.

Who is responsible for your information

I am Gregory van Beurden, trading as GVB Psychotherapy. I am the data controller while I remain responsible for the practice. If my Clinical Will is activated because I die or become unable to practise, Professional Clinical Wills may assume controller responsibility for the personal information it handles under those arrangements, as described below.

- Email: info@gvb-psychotherapy.co.uk
- Telephone: 020 3960 5417
- Website: https://gvb-psychotherapy.co.uk/
- ICO registration number: ZB956141

Information I collect

Depending on how you contact me and whether therapy begins, I may collect:

- your name, address, date of birth, telephone number and email address;
- enquiry details, appointment information and correspondence;
- your GP's name and contact details and an emergency contact;
- information about your physical and mental health, relevant medical history, medication, presenting concerns and therapeutic work;
- assessment information and session notes;
- safeguarding and risk information where relevant, including information about alleged or suspected unlawful conduct where this is necessary and lawful;
- payment, invoicing and attendance information; and
- limited technical information generated when you use the website, including information processed by website security and statistics tools.

Where information comes from

Most information comes directly from you. I may also receive limited information from a person enquiring on your behalf, an employer or Employee Assistance Programme, a referral platform, another professional with appropriate authority, or a statutory body. If someone contacts me about you, I do not assume that you have agreed to therapy and I will normally seek direct contact with you before proceeding.

Why I use your information and my lawful bases

Enquiries and providing therapy

I use contact, assessment, appointment and clinical information to respond to enquiries, assess whether I can offer therapy, agree and administer the therapeutic contract, provide therapy and communicate about our work. The Article 6 lawful basis is that processing is necessary to take steps at your request before entering a contract or to perform the therapeutic contract (Article 6(1)(b) UK GDPR).

Health and therapy information

Information about physical or mental health is special category data. I process it where necessary to provide health or social care treatment under Article 9(2)(h) UK GDPR and Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018. I owe clients a duty of confidentiality under common law and professional ethical obligations.

Safeguarding and emergencies

I may use or disclose information where this is necessary to protect you or another person, address safeguarding concerns, respond to a serious risk of harm, or comply with a legal requirement. Depending on the circumstances, the Article 6 basis may be legitimate interests, vital interests or legal obligation. For special category data, the condition may include health or social care, legal claims, or substantial public interest safeguarding under Article 9(2)(g) UK GDPR and Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018. Where a safeguarding record includes criminal-offence data, I process it only where Article 10 UK GDPR and an applicable condition in Schedule 1 of the Data Protection Act 2018 permit this, for example safeguarding an individual at risk or preventing or detecting unlawful acts where the relevant requirements are met. Wherever it is safe and appropriate, I will discuss a proposed disclosure with you first.

Supervision and professional standards

I attend clinical supervision to support safe and ethical practice. I share only the information reasonably necessary for supervision and normally avoid using your name or other direct identifiers. Because the circumstances discussed may still make a client indirectly identifiable, I treat supervision material as confidential personal data rather than assuming it is anonymous. My supervisor is bound by professional confidentiality.

Records, complaints and legal claims

I retain appropriate records for continuity of care, professional accountability, responding to complaints and establishing, exercising or defending legal claims. The Article 6 basis is legitimate interests (Article 6(1)(f)). These interests are maintaining safe and accountable practice and being able to respond fairly to a complaint or claim. Where special category data is required for legal claims, Article 9(2)(f) may apply.

Financial and legal requirements

I use and retain financial information to manage invoices, accounts and tax obligations. The Article 6 basis is legal obligation where the law requires the record, and legitimate interests for proportionate practice administration.

How clinical records are organised

Clinical notes are kept separately from the main identifying record and use a client reference code. The code can be linked back to you through a separate index when necessary. The notes are therefore pseudonymised, not anonymous, and remain personal data. I record only information that is relevant to the therapeutic work, safeguarding, continuity or professional accountability.

Who may receive or access information

Information is shared only where necessary and proportionate. Recipients may include:

- my clinical supervisor, who receives only the information reasonably necessary for supervision; I normally avoid names and other direct identifiers, but the material may remain indirectly identifiable and is treated as confidential personal data;
- Microsoft services used for email, file storage and online sessions, including Outlook, OneDrive and Teams;
- WhatsApp, where you choose to use it for an initial enquiry or practical appointment arrangements. It is not intended for detailed clinical information or urgent or safeguarding communication. Messages may be stored on my iPhone and included in Apple iCloud backup services;
- WebHealer and the WordPress website environment, which provide website hosting and technical support;
- an accountant or financial service provider, limited to the information required for accounting, invoicing or tax;
- an EAP or referral platform where it arranged or funds the therapy, limited to the commissioning, attendance, payment or reporting information agreed for that arrangement;
- a GP, emergency contact, safeguarding service, police, court or other statutory authority where disclosure is necessary and lawful; and
- Professional Clinical Wills (PCW), my designated clinical-executor service. Before activation, PCW acts as my processor for the limited client contact and appointment information I provide for continuity planning and keep updated. Clinical notes are not routinely shared. A tested emergency-access route gives PCW a standing technical capability to access my practice Microsoft 365 account, and that capability is not technically confined to the clinical-records folders. PCW is authorised to use it only after my Clinical Will has been activated by an authorised person who requests PCW to act because I have died or become unable to practise. PCW may then access and manage information needed to contact clients, arrange continuation, transfer or ending of therapy, respond to properly authorised records requests and carry out its agreed continuity responsibilities. PCW assumes controller responsibility for the personal information it handles during that activated period. If I fully recover and resume responsibility, controller responsibility returns to me after I explicitly notify PCW. PCW applies the retention and confidential-destruction instructions stated in this notice and reviews the records every three months. Any access or disclosure remains subject to identity, authority and applicable data-protection checks.;

I do not sell personal information and do not disclose clinical content for marketing. A referral or funding organisation does not receive details of what is discussed in therapy unless you authorise this or another lawful basis requires disclosure.

Service providers and international transfers

Some technology providers operate internationally. Where personal information is transferred outside the UK, I require an appropriate transfer mechanism, such as UK adequacy regulations, the UK Extension to the EU-US Data Privacy Framework where applicable, or contractual safeguards. The precise services and safeguards are reviewed as part of GVB Psychotherapy's information-governance records.

Website enquiries, statistics and cookies

When you use the contact form, the information you submit is transmitted through the website and email systems so that I can respond. The website and hosting providers necessarily process limited information to deliver and secure that service; I do not describe the form as involving no third-party processing.

The website uses WP Statistics for basic visitor statistics. WebHealer has confirmed that IP addresses have been anonymised by hashing since collection began. The automatic statistics cleanup period is set to 730 days.

The website may also contain embedded content such as Google Maps. Embedded services can receive technical information when they load. The Cookies Policy identifies the cookies and embedded services currently in use and explains the available choices. Google Ads measurement is not currently active. A replacement consent-management arrangement, including a persistent way to change or withdraw consent, is under technical review and will not be treated as operational until it has been implemented and tested.

How long I keep information

Record	Retention period	Reason
Substantive assessment and therapy records, including clinically relevant correspondence and session notes	7 years after the last substantive clinical session, including assessment where ongoing therapy does not begin	Continuity, professional accountability, complaints and legal claims
Enquiry and Initial Conversation records without substantive assessment or therapy	12 months after the last contact	Responding to follow-up enquiries and maintaining an accurate enquiry record
Website contact-form enquiry	12 months after submission, unless it becomes part of a client record	Responding to and evidencing the enquiry
Financial and invoicing records	6 years	Tax and accounting requirements
Professional indemnity and related claim records	7 years, or longer where a live claim or legal hold requires it	Insurance and claim management
Website statistics	Automatic cleanup set to 730 days	Proportionate website performance information

A documented legal, safeguarding, insurance or complaint hold suspends disposal of the relevant records pending review and formal release. When the applicable period ends, records are securely deleted. Copies in deleted-items folders or backups are removed as those systems expire or rotate.

Email and messaging

Routine administrative email and WhatsApp messages are deleted when they are no longer needed. Correspondence that is clinically relevant, records an agreement, relates to safeguarding, or may be needed for a complaint or claim is transferred or retained as part of the appropriate client or business record and follows that record's retention period. WhatsApp should not be used for urgent, safeguarding or detailed clinical information. I do not rely on printing and rescanning messages as the standard retention method.

Security

I use proportionate technical and organisational measures. Authoritative GVB client records are held in a restricted GVB business OneDrive structure rather than in personal cloud storage or routine download folders. Current controls include access restrictions, multi-factor authentication, device encryption, a verified encryption recovery key, OneDrive version history, tested restoration of a routine file version and end-to-end encrypted WhatsApp backups. The restricted clinical-records folder is owner-only and unshared during routine operation. PCW's emergency-access route has been tested successfully, but it reaches the practice Microsoft 365 account and is not technically limited to clinical folders. Its use is therefore restricted by the Clinical Will activation procedure and must be reviewed and retested after a material change. No security measure can eliminate all risk, and controls are reviewed as the practice and its technology change.

Your rights

Depending on the circumstances, you may have the right to:

- be informed about how your information is used;
- request access to your personal information;
- ask for inaccurate or incomplete information to be corrected;
- request deletion of information where the right applies;
- request restriction of processing;
- object to processing based on legitimate interests; and
- receive certain information in a portable format where the legal conditions apply.

These rights are not absolute. For example, I may need to retain information to comply with law, protect another person, or establish, exercise or defend legal claims. I will explain the reason if I cannot fully comply with a request. I do not charge a fee for an ordinary rights request, although the law permits a reasonable fee or refusal in limited circumstances where a request is manifestly unfounded or excessive.

Right to object

Where I rely on legitimate interests, you have the right to object to that processing. I will stop unless I can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is needed for legal claims.

Automated decision-making

I do not use automated decision-making or profiling to decide whether or how therapy is provided.

Complaints

You may complain directly to me about how I have used your personal information. Please email info@gvb-psychotherapy.co.uk and explain what you believe has gone wrong and what outcome you are seeking. I will acknowledge and investigate the complaint and provide an outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office. Information is available at https://ico.org.uk/make-a-complaint/ or by telephone on 0303 123 1113.

Changes to this notice

I review this notice when my services, systems, recipients or legal obligations change. The date at the top shows when it was last updated.