

PRIVACY POLICY

Mosaic Therapy

Last updated: 16 September 2026

Mosaic Therapy ("Mosaic Therapy", "I", "me", or "my") is committed to protecting the privacy and confidentiality of personal data processed in connection with the provision of counselling and wellbeing services.

This Privacy Policy explains how personal data is collected, used, stored, retained, and disclosed. It also sets out the rights available to individuals under the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018, together with relevant professional and regulatory requirements.

1. Data Controller

For the purposes of applicable data protection legislation, I am the data controller responsible for the processing of personal data described in this Privacy Policy.

Mosaic Therapy

Business structure: Sole Trader

ICO Registration Number: ZC248036

Email: contact.mosaictherapy@gmail.com

2. Personal Data I Collect

I collect and process personal data that is reasonably necessary for the provision and administration of counselling services and the safe and lawful operation of the practice.

Depending on the nature of our relationship, the personal data I may collect includes:

- Your name and contact details, including email address and telephone number;
- The name and contact details of an emergency contact, where provided and considered necessary for safeguarding and safety purposes;
- Information disclosed by you during counselling sessions;
- Clinical notes and other records necessary for the provision of counselling services;
- Payment and transaction information, where applicable. Payment processing may be undertaken by third-party payment service providers, and payment card details are not stored by me;
- Information relating to communications and correspondence between you and Mosaic Therapy; and
- Technical information relating to your use of my website, including cookies and analytics data, where applicable.

I will seek to limit the collection of personal data to information that is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

I do not sell personal data or disclose personal data to third parties for their own direct marketing purposes.

3. Purposes of Processing

Personal data may be processed for the following purposes:

- Providing counselling and therapeutic services;
- Assessing and responding to enquiries and requests for services;
- Managing appointments and communicating with clients;
- Maintaining appropriate clinical and administrative records;
- Processing payments and maintaining financial records;
- Managing the security and proper operation of the practice;
- Meeting legal, regulatory, professional, safeguarding, insurance, and accounting obligations;
- Obtaining professional supervision where required, subject to appropriate confidentiality and anonymisation arrangements; and
- Establishing, exercising, or defending legal claims where necessary.

Personal data will not be processed in a manner incompatible with the purposes for which it was collected, except where such processing is permitted or required by applicable law.

4. Lawful Bases for Processing

I process personal data only where a lawful basis for processing exists under the UK GDPR.

Depending on the circumstances, the relevant lawful basis may include:

Performance of a Contract

Processing may be necessary for the performance of a contract with you, or in order to take steps at your request prior to entering into a contract, including the provision and administration of counselling services.

Legitimate Interests

Processing may be necessary for my legitimate interests in operating, managing, securing, and administering the practice, provided that such interests are not overridden by your fundamental rights and freedoms.

Legal Obligation

Processing may be necessary to comply with legal or regulatory obligations, including requirements relating to financial records, safeguarding, insurance, professional standards, and other applicable legal obligations.

Consent

Where consent is relied upon as the lawful basis for processing, consent will be obtained where appropriate and may be withdrawn at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

Where special category personal data is processed, including health-related information, I will rely on an applicable condition under Article 9 of the UK GDPR in addition to an applicable lawful basis under Article 6.

5. Confidentiality and Disclosure of Information

Information disclosed during counselling is treated as confidential and will not ordinarily be disclosed to third parties without your informed consent.

However, confidentiality is subject to certain legal, professional, and safeguarding limitations. Information may be disclosed without your consent where:

- Disclosure is required by law or by a legally binding court order;
- Disclosure is necessary to prevent or reduce a serious risk of harm to you or another person;
- There are safeguarding concerns relating to you or another person;
- Disclosure is necessary to comply with a legal or regulatory obligation; or
- Disclosure is otherwise permitted by applicable law.

Where professional supervision is required, relevant information may be discussed in anonymised or appropriately limited form, in accordance with applicable professional ethical standards, including the BACP Ethical Framework where relevant.

Where it is lawful, safe, and practicable to do so, I will seek to discuss any proposed disclosure with you before information is shared.

Any disclosure will be limited to information that is necessary, relevant, and proportionate to the circumstances.

6. Data Security

I take appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction, damage, alteration, or disclosure.

Such measures may include the use of password-protected systems, secure electronic devices, access controls, and other appropriate security procedures.

Although I take reasonable steps to protect personal data, no method of electronic storage or transmission can be guaranteed to be completely secure.

7. Data Retention

Personal data will be retained only for as long as is reasonably necessary for the purposes for which it was collected, or for as long as required by applicable legal, regulatory, professional, accounting, insurance, or safeguarding obligations.

My anticipated retention periods are as follows:

- **Clinical records and notes:** ordinarily retained for 7 years, subject to applicable clinical, legal, professional, and insurance requirements;
- **Financial and accounting records:** ordinarily retained for 6 years in accordance with applicable HMRC requirements;
- **Contact details:** retained for as long as reasonably necessary for communication and the provision or administration of services;
- **Emails and other correspondence:** retained for as long as reasonably necessary for clinical, administrative, legal, safeguarding, or record-keeping purposes.

At the end of the applicable retention period, personal data will be securely deleted, destroyed, or otherwise disposed of in an appropriate manner.

8. Sharing Personal Data with Third Parties

Personal data may be shared with third parties only where there is a lawful basis to do so and where such disclosure is necessary and proportionate.

Depending on the circumstances, this may include:

- Payment service providers, where necessary to process payments;
- Professional supervisors, where appropriate and subject to applicable confidentiality and anonymisation requirements;
- Professional advisers, insurers, or legal representatives where necessary;
- Regulatory, governmental, or law enforcement bodies where required or permitted by law; and
- Other third parties where you have provided informed consent or where disclosure is otherwise legally authorised.

I do not sell personal data.

Where third-party service providers process personal data on my behalf, I will seek to ensure that appropriate contractual and security arrangements are in place.

9. Your Data Protection Rights

Subject to applicable legal conditions and exemptions, you may have the following rights under the UK GDPR:

- **The right of access** – to request access to the personal data I hold about you;

- **The right to rectification** – to request correction of inaccurate or incomplete personal data;
- **The right to erasure** – to request deletion of personal data in certain circumstances;
- **The right to restriction of processing** – to request that processing is restricted in certain circumstances;
- **The right to object** – to object to certain types of processing;
- **The right to data portability** – to request receipt of certain personal data in a structured, commonly used, and machine-readable format, where applicable; and
- **The right to withdraw consent** – where consent is the lawful basis for processing.

These rights are not absolute and may be subject to legal limitations or exemptions.

Requests relating to your data protection rights should be submitted to:

Email: contact.mosaictherapy@gmail.com

I may need to request additional information to verify your identity before responding to a request.

10. Cookies and Website Data

My website may use cookies and similar technologies to support website functionality, improve user experience, and, where applicable, analyse website usage.

You may manage or disable cookies through your browser settings. Certain website functions may be affected if cookies are disabled.

Where applicable, further information about the cookies and analytics technologies used on the website may be provided through a separate Cookie Policy or cookie notice.

11. Data Breaches

In the event of a personal data breach, I will assess the nature and severity of the breach and take appropriate steps in accordance with applicable data protection law.

Where legally required, I will notify the Information Commissioner's Office and/or affected individuals within the applicable statutory timeframes.

12. Complaints

If you have any questions, concerns, or complaints regarding the processing of your personal data, you should initially contact:

Mosaic Therapy

Email: contact.mosaictherapy@gmail.com

I will consider and respond to complaints in accordance with applicable legal and professional requirements.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO"), the UK's supervisory authority for data protection matters.

Information Commissioner's Office (ICO)<https://ico.org.uk>

13. Changes to This Privacy Policy

I may amend this Privacy Policy from time to time to reflect changes in applicable legislation, regulatory requirements, professional guidance, technology, or the manner in which the practice operates.

The most recent version of this Privacy Policy will be made available on this website and will take effect from the date stated at the beginning of the policy.

14. Contact

For any questions regarding this Privacy Policy or the processing of your personal data, please contact:

Mosaic Therapy

Email: contact.mosaictherapy@gmail.com