



DR. HANNAH SUGARMAN
CLINICAL PSYCHOLOGIST

Privacy Policy: Dr. Hannah Sugarman

Trading as: Hannah Sugarman Limited

This privacy notice provides information on how **Hannah Sugarman Limited** collects and processes your personal data. It is important that you read this notice so that you are fully aware of how and why we are using your data.

1. Important Information

Dr. Hannah Sugarman is the **Data Controller** and is responsible for your personal data. As a Clinical Psychologist, I am registered with the Information Commissioner's Office (ICO) and adhere to the professional standards set by the **HCPC** and **BPS**.

- **Contact Email:** hannah@drhannahsugarman.com
- **Postal Address:** Numbercloud, 14 High Street, Saffron Walden, Essex, CB10 1AY

2. The Data I Collect About You

I collect, use, and store different kinds of personal data about you, categorized as follows:

- **Identity & Contact Data:** Name, date of birth, gender, address, email address, and telephone numbers.
- **Clinical Data (Special Category):** Brief summary of your difficulties, GP contact details, screening measures (e.g., IAPT minimum data set, SAPAS), and clinical session notes.
- **Emergency Contact Data:** Name, number, and relationship of your designated emergency contact.
- **Technical Data:** Information submitted via my Wix website contact form (Name, Email, Phone, Insurance info).

3. How Your Data is Collected

- **Direct Interaction:** You provide data by filling in the contact form on my website or during our initial consultation.



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- **Clinical Assessment:** Information provided during therapy sessions and through completed screening measures or signed Terms and Conditions.

4. How I Use Your Personal Data

I only use your data when the law allows me to. Most commonly:

- **Contractual Necessity:** To provide the clinical psychology services you have requested.
- **Legitimate Interests:** For the effective management of your care and my practice.
- **Special Category Processing:** Under the "Provision of Health or Social Care" (GDPR Article 9(2)(h)).

5. Data Security & Storage

I am committed to ensuring your data is secure.

- **Digital Storage:** All client records are stored in **Cliniko**, a practice management system protected by **Two-Factor Authentication (2FA)**.
- **Session Notes:** Hand-written notes taken during sessions on a **reMarkable** tablet are kept anonymous, with no identifiable information (e.g., names) attached.
- **Communication:** Any clinical reports sent via PDF are **password-protected**.
- **Paper Records:** I maintain minimal paper records. Where these exist, they are kept without names to ensure anonymity.

6. Disclosures of Your Personal Data

Your data is kept confidential, with the following exceptions:

- **Professional Supervision:** I discuss anonymised cases (using initials or first names only) with a clinical supervisor to ensure the highest standard of care.
- **Third-Party Payers:** If your sessions are funded via insurance, solicitors, or case managers, I share information as required by their specific reporting policies.
- **Legal & Safety (Breaking Confidentiality):** In line with BPS and HCPC standards, I may be required to share information without consent if:
 - There is a serious risk of harm to yourself or others.
 - There is a safeguarding concern regarding a child or vulnerable adult.
 - I am legally compelled to do so (e.g., by a court order).



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7. Data Retention

I will only retain your personal data for as long as necessary to fulfill the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

- **Adults:** Records are retained for **7 years** following the end of treatment, in line with BPS guidelines.
- **Children (if applicable):** Records are retained for 7 years after the individual's 18th birthday.

8. Your Legal Rights

Under certain circumstances, you have rights under data protection laws, including the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data (subject to legal/professional record-keeping requirements).
- Object to processing or request restriction of processing.

9. Website Cookies (Wix)

My website is hosted on the Wix platform. Wix uses cookies to provide the services and features offered on our website and to improve user experience. You can manage your cookie preferences through your browser settings.