

This **Privacy Policy** explains how **Blue Serenity Therapy** collects, uses, and protects personal data in compliance with the **General Data Protection Regulation (GDPR)** and Dutch data protection laws. Protecting your privacy is of utmost importance to me to ensure legal and ethical compliance for this practice, and online safety and security for you as a client.

Data Controller Information

The data controller responsible for processing your personal data is:

- ♦ **Practice Name:** Blue Serenity Therapy
 - ♦ **Contact Person:** Brittany Carroll
 - ♦ **Email:** info@blueserenity-therapy.nl
-

Types of Personal Data Collected

I may collect the following types of personal data from clients:

- ♦ **Identification Data:** Name, date of birth, address, phone number, and email address.
 - ♦ **Health Data:** Information shared during therapy sessions, including medical history, psychological assessments, and treatment plans.
 - ♦ **Financial Data:** Bank account details for payment purposes and invoicing.
 - ♦ **Communication Data:** Emails, phone calls, and messages exchanged with the therapist.
-

Purpose of Data Collection

Your personal data is collected and processed for the following purposes:

- ♦ To provide psychological counseling and therapy services.
- ♦ To manage appointments and communication.
- ♦ To handle invoicing and payment processing.
- ♦ To comply with legal obligations (e.g., record-keeping requirements and GDPR-compliance).
- ♦ To improve the quality of my services through supervision and intervision (with anonymized data).

Legal Basis for Processing Personal Data

I process your personal data based on the following legal grounds:

- ♦ **Consent:** You provide explicit consent for me to process your personal data for therapy purposes by signing both the **Treatment Agreement** and **Consent for Services** prior to beginning therapy with me.
- ♦ **Contractual Obligation:** Processing is necessary to fulfill the treatment agreement between you and the therapist.
- ♦ **Legal Obligation:** I am required to retain certain data by Dutch law (e.g., financial records).
- ♦ **Legitimate Interest:** To ensure the quality and continuity of the therapy provided.

Data Retention Policy

I retain personal data for a period of **15 years** from the date of the last session, as required by Dutch healthcare regulations (WGBO, Article IV, <https://www.rivm.nl/cpt/kwaliteit-wet-en-regelgeving/wetgeving/wgbo>).

After this period, your data will be securely deleted or anonymized - or shredded for physical documents.

How Your Data is Protected

I take appropriate technical and organizational measures to ensure that your personal data is secure. This includes:

- ♦ Encrypted storage of digital files.
- ♦ Secure filing systems for physical documents.
- ♦ Restricted access to data.
- ♦ Regular data security checks and updates.

Sharing of Personal Data

Your personal data will only be shared with third parties in the following cases:

- ♦ **With Your Explicit Consent:** For example, sharing information with a medical specialist.
- ♦ **Legal Requirements:** If I am legally required to disclose your information (e.g., court order).
- ♦ **Data Processors:** I use GDPR-compliant third-party services (e.g., practice management software, invoicing tools) that process data on my behalf.

Your Rights as a Client

Under the GDPR, you have the following rights regarding your personal data:

1. **Right to Access:** You can request a copy of your personal data.
2. **Right to Rectification:** You can request corrections to your data if it is inaccurate.
3. **Right to Erasure:** You can request the deletion of your data (within legal limits).
4. **Right to Restrict Processing:** You can request that I limit the processing of your data.
5. **Right to Data Portability:** You can request that your data be transferred to another service provider.
6. **Right to Object:** You can object to the processing of your data in certain cases.
7. **Right to Withdraw Consent:** You can withdraw your consent for data processing at any time.

To exercise any of these rights, please contact me using the details provided above.

Data Breach Procedure

In the unlikely event of a data breach that affects your personal data, I will:

1. Notify the **Autoriteit Persoonsgegevens** (Dutch Data Protection Authority) within 72 hours.
 2. Inform you if the breach poses a high risk to your privacy.
 3. Advise on any next steps.
-

Complaints and Questions

If you have any concerns or complaints about how I handle your personal data, you can contact me at any time. If I cannot resolve your concern, you have the right to file a complaint with the **Autoriteit Persoonsgegevens**:

- ♦ **Website:** <https://autoriteitpersoonsgegevens.nl>
 - ♦ **Phone:** +31 (0)88 1805 250
-

Updates to this Privacy Policy

I may update this Privacy Policy at any time to reflect changes in my practices or legal requirements. The latest version will always be available on my website or upon request.