

## Privacy Policy of Alma Counselling



### YOUR PRIVACY

For a good counselling/treatment process it is necessary that I, as your treating therapist, create a file. This is also a legal obligation. Your file contains notes about your problems and information about the counselling/treatment process that has been carried out.

The file also can contain information that is necessary for your treatment and that I have requested, **after your explicit permission**, from another healthcare provider, for example from the general practitioner.

I do my best to guarantee your privacy. This means, among other things:

- careful handling of your personal and medical data
- ensure that unauthorised persons do not have access to your data

As your treating therapist, I have sole access to the data in your file.

I have a legal duty of confidentiality (professional secrecy).

The data from your file can be used for the following purposes:

- To inform other care providers, for example when the therapy has been completed or when a referral is made to another practitioner. **This only happens with your explicit consent.**
- For the use of replacement, in my absence.
- For the anonymized use during peer review.
- A small part of the data from your file is used for the financial administration, so that I or my administrator/ the financial team can draw up an invoice.

**If I want to use your data for another reason, I will first inform you and explicitly ask for your permission.**

The client file will be kept for 20 years as required by the law.

### PRIVACY related to the INVOICE

The invoice you receive contains the information requested by the health insurer, so that you can declare this bill to your health insurer.

- Your name, address and place of residence
- Your date of birth
- The date of the treatment
- A short description of the treatment, such as 'counselling' or 'psychosocial consultation'
- The cost of the consultation
- Your insurance number and the name of your insurance company

Financial data related to the client file will be kept for 7 years as required by the law.

## YOUR RIGHTS

Under the General Data Processing Regulation (GDPR) you have the following privacy rights:

**Right to data portability:** The right to receive and transfer the personal data.

**Right to be forgotten:** The WGBO law, which obliges the counsellor to keep files for at least 20 years, is a legal obligation that supersedes the GDPR right of a client to have processed personal data erased. This also includes the right of destruction. The right to destroy only applies to data that the counsellor has stored in the context of the obligation to file. Financial and administrative data about the client and personal work notes do not fall under the right to annulment. The right to annulment does not apply if your counsellor can invoke a ground for refusal.

**Right to rectification, addition and adjustment of the processing of hard personal data.** This is personal data without judgement. You have the right to have the use of the hard data adjusted if:

- the data may be incorrect
- the data is incomplete
- the processing is unlawful
- the data is no longer needed

**Right of access. The right to view your personal data.** These are not the counsellor's notes that he/she makes for himself. You have the right to request access to your personal data. After receiving your request, you will receive an overview of your personal data within 1 month. If this shows inaccuracies, you can request that your data be adjusted, supplemented, deleted or protected.

**Right in relation to automated decision-making and profiling.** With automated decision-making, you are always entitled to a human view of these decisions.

**Right to object to data processing.** The right to object to the processing of personal data. If you want to claim one of these rights, you can use the following sample letters <https://autoriteitpersoonsgegevens.nl/nl/zelf-doen/example-letters> and submit them to me.

We will then draw up a document in which new agreements are made regarding the handling of your personal data.

If you have a complaint about the services I have provided, I would like to ask you to discuss this with me. If we cannot resolve the matter, I will refer you for complaints relating to the treatment to the ABvC, with the support of a complaints officer ([complaints@abvc.nl](mailto:complaints@abvc.nl)).

**If the efforts of the complaints officer do not lead to a satisfactory outcome for you, you can submit your complaint as a dispute to the Complementary Healthcare Disputes Committee. You can find more information about the process on the website of SCAG: <https://www.scag.nl/>**

Please note: the Disputes Committee will not handle your complaint if you have not first gone through the complaints procedure with the complaints officer.