

Privacy Policy

Amaris Raiana Therapy Last updated: 9 July 2026

UK GDPR compliant · DUAA 2025 compliant

Who We Are

I am Amaris Raiana, a therapist in private practice trading as Amaris Raiana Therapy. I provide therapy services and am committed to protecting your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

You can contact me at: amaris@amarisraianatherapy.com

My full compliance documents are available at: <https://amarisraiana.com>

What Personal Data We Collect

I collect and process the following categories of personal data:

- **Contact details:** your name, address, telephone number, and email address.
- **Emergency contact information:** name and contact details of someone I can reach in an emergency.
- **Health and therapy-related information:** details about your presenting issues, relevant medical history, current medications, GP details, and any previous therapy experience.
- **Session notes:** written records of our sessions together, including observations, themes discussed, and therapeutic progress.
- **Financial records:** invoices and payment records.

Your health and therapy-related information, including session notes, is classified as special category data under Article 9(1) of the UK GDPR. This type of sensitive personal data receives enhanced protection under data protection law, and I take additional care to keep it secure.

How We Collect Your Data

I collect personal data directly from you:

- When you first contact me to enquire about therapy.
- During our initial consultation and assessment.
- Throughout our ongoing sessions together.

- Through any emails or telephone conversations we have.
- When you complete intake forms or questionnaires.

I do not collect personal data about you from third parties unless you have given explicit consent for this, or it is necessary to protect your vital interests.

Why We Process Your Data - Lawful Basis

To process your personal data lawfully, I rely on the following legal bases under UK GDPR.

Article 6 basis (ordinary personal data): Article 6(1)(b) UK GDPR - processing is necessary for the performance of the therapeutic contract between us. When you engage me as your therapist, we enter into an agreement for me to provide therapy services. I need to process your personal data to fulfil that agreement.

Article 9 basis (special category data): Article 9(2)(h) UK GDPR - processing is necessary for the provision of health or social care treatment by a health professional. As a therapist providing healthcare services, I am permitted to process your sensitive health information for the purposes of your treatment.

The additional condition required under UK law is met through DPA 2018, Schedule 1, Part 1, paragraph 2 (health or social care purposes). Processing is carried out by a qualified therapist subject to the professional obligation of confidentiality under the codes of ethics and practice of COSRT and BACP.

Professional Obligations and CPD

I am registered with COSRT and BACP, and am required by both bodies to attend regular clinical supervision as part of maintaining safe and ethical practice. I may discuss our therapeutic work with my supervisor. When I do so:

- Your name and any identifying details are not shared with my supervisor.
- I use anonymised or pseudonymised case material only - this means I remove or change any information that could identify you.
- My clinical supervision is provided by a qualified professional bound by the same confidentiality obligations as I am.
- My supervisor is bound by their own professional code of ethics and practice.

Beyond my supervisor, the following people may have limited access to some of your information, strictly limited to what is necessary for their role in line with the data minimisation principle (Article 5(1)(c) UK GDPR):

- **An external accountant or bookkeeper:** they have access to invoice data only (your name and amounts paid) for accounting purposes, for as long as required

to meet HMRC's statutory record-keeping requirement (see the retention table below). They do not have access to any clinical information.

- **Administrative help:** they may have access to my calendar and your contact details to assist with appointment scheduling. They do not have access to clinical notes or session content.

All of these parties are bound by confidentiality obligations and only receive the minimum information necessary to perform their role.

Who We Share Your Data With

I use the following third-party services, which may process some of your data:

- **Psychology Today** - for online video therapy sessions. Their platform meets US HIPAA compliance standards; where your data is processed via this platform, I additionally rely on the UK GDPR safeguards described below.
- **Wix** - this website is built on Wix, which sets its own essential, functional, and analytics cookies to operate and secure the site, and may collect certain technical data about visitors. Details of Wix's own data practices are available in Wix's privacy and cookie documentation, linked from my cookie policy.

Each of these services operates under its own privacy policy and data processing terms. Links to their privacy policies are available on request.

I never sell your personal data to anyone, under any circumstances.

International Data Transfers

The following third-party services I use may transfer personal data outside the United Kingdom:

- Psychology Today (USA)
- Wix (Wix.com Ltd - data may be processed in the USA and other locations outside the UK)

Where data is transferred outside the UK, I rely on Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) as appropriate safeguards, in accordance with UK GDPR Chapter V and the updated requirements of the Data (Use and Access) Act 2025.

The USA does not currently have a UK adequacy decision, which means transfers to the USA require these additional safeguards to ensure your data remains protected.

You can request a copy of the relevant transfer safeguards by contacting me at amaris@amarisraianatherapy.com.

How Long We Keep Your Data

I keep your personal data only for the minimum period required or justified in law, as follows.

Type of record	Retention period	Reason
Therapy records (including session notes)	7 years after our last session	Beyond the This is the legal minimum, based on the Limitation Act 1980 negligence-claim period. (Note: BACP's own good-practice guidance recommends a longer 7-year period as a safer margin. I have set out the legal minimum here, but you're welcome to ask about the longer professional-guidance period.)
Financial records (invoices, payment records)	6 years	HMRC legal requirement
Website enquiries (if you contact me but do not become a client)	6 months	There is no statutory minimum for this category. Six months reflects the minimum period necessary to respond to and follow up on an enquiry, in line with the data minimisation principle.

After the applicable retention period ends, your records are securely destroyed.

Your Rights Under UK GDPR

You have the following rights regarding your personal data:

- **Right to be informed:** You have the right to know how I collect and use your personal data. This privacy policy fulfils that right.
- **Right of access:** You can request a copy of the personal data I hold about you. This is known as a Subject Access Request. Under the Data (Use and Access) Act 2025, I will conduct a reasonable and proportionate search when responding to your request.
- **Right to rectification:** If any personal data I hold about you is inaccurate or incomplete, you can ask me to correct it.
- **Right to erasure:** You can ask me to delete your personal data in certain circumstances. However, this right is not absolute - I may need to retain your

records until the end of the applicable retention period where this is required by professional guidelines, insurance requirements, or law.

- **Right to restrict processing:** You can ask me to limit how I use your data in certain circumstances.
- **Right to data portability:** You can request that I transfer your data to another organisation or to you directly, in a structured, commonly used format.
- **Right to object:** You can object to processing based on legitimate interests. However, most of my processing is based on contract and health purposes, so this right may not apply.
- **Rights related to automated decision-making:** You have rights regarding automated decisions that significantly affect you. I do not use automated decision-making in my therapy practice.

To exercise any of these rights, please contact me at: amaris@amarisraianatherapy.com

I will respond to your request within one month. There is no fee for most requests, though I may charge a reasonable fee if your request is clearly unfounded or excessive.

Data Protection Complaints - Your Right Under the Data (Use and Access) Act 2025

You have the right to make a data protection complaint directly to me. If you are unhappy with how I have handled your personal data, please let me know so I can try to resolve the issue.

You can submit a complaint at: <https://amarisraiana.com> (Make a Complaint page)

Or contact me directly at: amaris@amarisraianatherapy.com

If you are not satisfied with my response, you have the right to escalate your complaint to the Information Commissioner's Office (ICO):

- **Website:** ico.org.uk
- **Telephone:** 0303 123 1113
- **Address:** ICO, Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Confidentiality Exceptions

Everything you share with me in therapy is treated as confidential. However, there are limited circumstances where I may need to share information without your consent:

- **Risk of serious harm:** If I believe you or someone else is at serious risk of harm, I may need to share relevant information with appropriate services to help keep people safe.

- **Safeguarding concerns:** If I become aware of concerns about a child or vulnerable adult being at risk of abuse or neglect, I have a duty to report this to the appropriate authorities.
- **Court order:** If a court orders me to disclose information, I am legally required to comply.

In most circumstances, I will try to discuss any disclosure with you first, unless doing so would itself put someone at risk of harm.

Changes to This Policy

I review this privacy policy annually and whenever my practices change. If I make significant changes that affect how your data is processed, I will inform you directly.

You can always find the current version of this policy at: <https://amarisraiana.com>