



Rachel G Therapy

Privacy Policy

Last updated: May 2026

1. Who We Are

The data controller for Rachel G Therapy is Rachel Ghinn, a sole-practitioner hypnotherapist based in England. If you have any questions about this policy or how your personal data is handled, please contact:

Rachel G Therapy | rachelghinn@gmail.com | 07463 877298

2. What Personal Information We Collect

We collect only the personal information that is necessary to provide you with hypnotherapy services. This may include:

- Your name and contact details (telephone number and/or email address)
- Relevant health information and medical history that you share with us during consultations
- Session notes (written only — sessions are not audio or video recorded)
- Your communication with us (e.g. emails or messages)

We do not collect your home address, as this is not necessary for the work we carry out together.

3. How We Collect Your Information

We collect personal information directly from you — through our discovery call, initial consultation form, during in-person sessions, or during online sessions conducted via Zoom. Zoom sessions are not recorded.

We do not use online booking systems or third-party payment processors. Payments are made by bank transfer, and we do not store your bank details.

4. Our Lawful Basis for Processing Your Data

As a therapist, we process your personal data under UK GDPR. The lawful bases we rely on are:

Legitimate Interests (Article 6(1)(f))

For most general practice data — such as keeping session notes, retaining contact details, and managing our client relationship — we rely on legitimate interests. We have assessed that:

- The purpose is genuine: to provide effective, safe hypnotherapy and to manage our professional responsibilities

- Processing is necessary: we only collect data that is required for this purpose
- The impact on your privacy is minimal: we collect no more than is needed and apply appropriate security measures

Recognised Legitimate Interests (DUAA 2025)

Following the Data (Use and Access) Act 2025, certain processing activities are covered by 'recognised legitimate interests', where a balancing test is not required. This applies in limited circumstances such as the prevention or detection of crime, safeguarding, or public safety. For example, if we are required to share information with the police or another statutory body for public safety reasons, the requesting organisation takes responsibility for the necessity of that disclosure.

Legal Obligation (Article 6(1)(c))

In some circumstances we may be required to process your data to comply with a legal obligation, for example in response to a court order.

Vital Interests (Article 6(1)(d))

If there is a risk to life — yours or another person's — we may need to share information to protect those vital interests.

5. Special Category Data

Health information is classified as 'special category data' under UK GDPR and receives additional protection. We process health-related information you share with us under Article 9(2)(h) — for the purposes of preventive or occupational medicine and the provision of health care — and in accordance with our professional obligations as a registered hypnotherapist.

6. How We Use Your Information

We use your personal information to:

- Provide hypnotherapy sessions (in person and via Zoom)
- Keep appropriate clinical notes to support your therapy
- Contact you regarding appointments or follow-up
- Meet our professional and legal obligations

7. Who We Share Your Information With

We treat your information with strict confidentiality. We do not share your personal data with third parties except in the following limited circumstances:

- Where we are legally required to do so (e.g. by court order)
- Where there is a serious risk to your safety or the safety of others (recognised legitimate interests under DUAA 2025 may apply here — see Section 4)
- With a clinical supervisor, on a confidential and anonymised basis where possible, as required by our professional code of practice

We do not sell, rent, or share your personal data for marketing purposes.

8. Online Sessions (Zoom)

Online sessions are conducted using Zoom. Zoom is a third-party platform with its own privacy policy, which you can review at zoom.us/privacy. Sessions are not recorded by us. You should be aware that by using Zoom, your connection data is processed by Zoom in accordance with their own terms. We recommend using a private and secure internet connection for your sessions.

9. How Long We Keep Your Information

We keep your personal information only for as long as is necessary. In line with professional guidance for hypnotherapists:

- Client records are typically retained for a minimum of 7 years after the end of therapy (or until a minor reaches the age of 25)
- After this period, records are securely destroyed

You may request early deletion of your data in certain circumstances — see Section 10 below.

10. Your Rights

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

- Right of access: you can request a copy of the personal information we hold about you (a Subject Access Request or SAR)
- Right to rectification: you can ask us to correct inaccurate information
- Right to erasure: in certain circumstances, you can ask us to delete your data
- Right to restriction: you can ask us to limit how we use your data
- Right to object: you can object to us processing your data on the basis of legitimate interests
- Right to data portability: in some cases, you can ask for your data in a portable format

To exercise any of these rights, please contact us using the details in Section 1. We will respond within one calendar month.

Subject Access Requests (SARs)

If you submit a SAR, we will carry out reasonable and proportionate searches of the records we hold. In line with the Data (Use and Access) Act 2025, we are not required to search every document or communication if it is unlikely to contain relevant data or would be disproportionately difficult to do so. We may ask you for clarification if needed, in which case the response deadline will be paused until we receive your reply.

11. Data Protection Complaints

If you have a concern about how we have used your personal information, we encourage you to contact us in the first instance so that we can try to resolve the matter.

How to make a complaint: Please use the electronic complaints form at <https://forms.gle/XogWq2w3h4TKoPgL8> You can also contact us by email at rachelghinn@gmail.com.

We will acknowledge your complaint within 30 days and will keep you informed of progress. We will advise you of the outcome without undue delay and will take appropriate steps in the meantime, including making enquiries into the subject matter of your complaint.

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

- Website: ico.org.uk
- Helpline: 0303 123 1113

Please note: this complaints procedure relates specifically to how your personal data is handled. For complaints about the nature of therapy or professional practice, you may contact our professional association directly and anonymously.

12. Data Security

We take the security of your personal information seriously. Measures we take include:

- Written session notes are stored securely and not accessible to third parties
- Electronic records (including emails) are stored on password-protected devices
- We do not transmit sensitive personal information by unencrypted email where avoidable
- We review our security practices regularly

13. Changes to This Policy

We may update this Privacy Policy from time to time. The most current version will always be available on our website. Where changes are significant, we will notify existing clients directly.