



Privacy Notice

For clients, parents and guardians, young people, enquirers and website visitors

Data controller	Jessie Way trading as Jessie Way Hypnotherapy
Contact	07444 326424 hello@jessieway.co.uk
ICO registration	Registration number pending
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Version	1.0

1 About this notice

This notice explains how I collect, use, store and share personal information in connection with Jessie Way Hypnotherapy. It applies to adult clients, young people aged 11 to 17, parents and guardians, people making enquiries, referrers and website visitors. I am the data controller for the personal information described in this notice.

I use personal information only where it is relevant to providing and administering my services, meeting professional and legal responsibilities, protecting clients and others, and running the practice. I do not sell personal information.

2 Information I may collect

Depending on the circumstances, I may collect:

- identity and contact details, including name, preferred name, pronouns, date of birth, address, telephone number and email address;
- parental responsibility, parent or guardian contact details, emergency contacts and relevant family or support information;
- appointment information, attendance, location and communications by telephone, email, text or WhatsApp;
- information about the reason for seeking hypnotherapy, goals, progress and outcomes;
- health, medication, disability, neurodivergence, lifestyle and other wellbeing information relevant to safe and appropriate support;
- GP, medical specialist, school, college, employer, referrer or other professional details where relevant;
- consent, assent, therapy agreements, session notes, correspondence and records of decisions;
- payment, invoice and transaction information, but not full bank-card details;
- complaint, incident, safeguarding and risk information; and
- limited technical information produced when someone uses my website, including information described in the separate Cookie Policy.

Health information and some information about disability, ethnicity, religion, sexual orientation or sex life may be special category data. I do not routinely ask for every type of information in this list. I collect it only where it is relevant and proportionate to the particular service, concern or safeguarding situation. I do not use biometric information to identify clients and I do not record therapy sessions.

3 Information about young people

For clients aged 11 to 17, information may relate to both the young person and the parent or guardian. I provide the young person with a separate Child Friendly Privacy Notice and explain confidentiality in language appropriate to

their age and understanding. A parent or guardian does not automatically receive a detailed account of what a young person says in an individual session.

I may share information without the young person's or parent's agreement where this is necessary and proportionate to protect the young person or another person, comply with the law, respond to an emergency or fulfil another overriding safeguarding responsibility. Wherever it is safe and appropriate, I will explain the intended sharing first.

4 Where information comes from

I may receive personal information:

- directly from the client or person making an enquiry;
- from a parent, guardian, family member or emergency contact;
- from a GP, medical specialist, school, college, employer, insurer, referrer or other professional, where there is an appropriate reason for the information to be provided;
- from a clinic, venue or organisation arranging or commissioning services; and
- from my website and the communication, invoicing, calendar and banking services used to run the practice.

5 Why I use information and the lawful bases

UK data-protection law requires a lawful basis under Article 6 of the UK GDPR. When I use health information or other special category data, I must also have a separate condition under Article 9. The bases that may apply are summarised below.

Purpose	How information is used	Lawful basis
Enquiries and arranging services	To respond, assess whether I can help, arrange appointments and take steps requested before therapy begins.	Contract or steps before contract where the person is party to the agreement; otherwise legitimate interests in responding and arranging the requested service.
Providing hypnotherapy	To assess needs, agree goals, provide safe and appropriate sessions, communicate and maintain clinical records.	Contract where applicable; otherwise legitimate interests in providing the requested service. For health information: Article 9(2)(h) and Schedule 1 Part 1 of the Data Protection Act 2018.
Administration and payment	To manage appointments, invoices, payments, banking, business records and tax obligations.	Contract; legal obligation; legitimate interests in administering the practice.
Safety and safeguarding	To assess risk, respond to concerns, seek advice, make referrals and protect a child or another person.	Legal obligation, legitimate interests or vital interests. For special category data: vital interests or substantial public interest in safeguarding children and people at risk under applicable UK law.
Complaints and legal matters	To respond to complaints, maintain insurance, establish or defend legal claims and meet regulatory or professional requirements.	Legal obligation and legitimate interests. For special category data: establishment, exercise or defence of legal claims.
Website operation	To provide essential website functions, maintain security and understand use where permitted.	Legitimate interests for essential operation; consent for non-essential cookies or similar technologies.

Where I rely on consent for a genuinely optional use, consent may be withdrawn at any time. Withdrawing consent does not affect processing that was lawful before withdrawal, and it does not require me to delete information that I must or am entitled to retain on another lawful basis.

6 Who I may share information with

Where necessary and lawful, information may be shared with:

- the client and, where appropriate, a parent, guardian or person authorised by the client;
- GPs, medical specialists, schools, colleges, employers, insurers, referrers or other professionals involved in relevant support, normally with appropriate knowledge or agreement unless an overriding reason applies;
- children's social care, a local authority designated officer, police, emergency services, the NSPCC or another safeguarding authority;
- clinics, venues, schools or organisations commissioning services, limited to what is necessary for administration, safety, safeguarding or the agreed service;
- my professional bodies, registers, insurer, legal advisers or other professional advisers;
- HM Revenue and Customs and other authorities where required by law; and
- carefully selected service providers that support the practice, including website hosting, professional email, communications, calendar, invoicing and banking providers.

I share only the information reasonably needed for the purpose. Service providers act under their own legal responsibilities or under contractual arrangements governing their use and protection of information.

7 Service providers and international processing

Current services used in running the practice include Wix for the website, Zoho for professional email and, where used, invoicing, WhatsApp and telephone services for communications, a phone calendar for appointments, and Starling Bank for business banking. These providers may store or process information outside the United Kingdom. Where UK data-protection law requires safeguards for an international transfer, I rely on the provider's applicable transfer arrangements and privacy terms.

Messages and emails may form part of the client record where they contain clinically, contractually or safeguarding-relevant information. Routine communications are not used for unrelated marketing. I do not currently operate a mailing list.

8 How long I keep information

I keep information only for as long as needed for the purpose for which it was collected and to meet professional, insurance, safeguarding, tax and legal requirements. The principal periods are below. A record may be retained longer where an insurer requires it, a complaint or legal claim is active or reasonably anticipated, safeguarding responsibilities apply, or another legal requirement prevents deletion.

Record	Usual retention	Reason
Adult client clinical record	Eight years from the client's last visit, subject to any longer insurer requirement.	CNHC record-retention requirement and legitimate interests in safe practice and legal claims.
Young person's clinical record	Until the client's 25th birthday, or 26th birthday if the client was 17 when treatment ended, subject to any longer insurer requirement.	CNHC record-retention requirement and the additional considerations applying to children's records.
Relevant emails, texts and WhatsApp messages	Retained with the applicable client record where they are clinically, contractually or safeguarding relevant; routine material is removed when no longer needed.	To preserve an accurate record without retaining unnecessary communications.
Safeguarding records	Kept separately and for as long as necessary under safeguarding, legal, professional and insurance requirements.	The appropriate period depends on the concern and any advice or action by relevant authorities.
Invoices, payments and tax records	Normally up to six years after the relevant financial period, or longer if required by law or an active enquiry.	Business administration and tax obligations.
Enquiries that do not become clients	Normally up to 12 months after the last meaningful contact, unless there is a reason to retain the information longer.	Follow-up, complaints, safety and practice administration.

9 How I protect information

Paper records are kept in a locked cabinet. Digital records are kept on a password-protected computer and within password-protected professional services. Access is limited to me unless another person or organisation is lawfully entitled to receive information. Safeguarding records are kept separately from routine therapy notes. I use data minimisation, appropriate access controls and secure disposal, and I review security arrangements when services or working methods change.

No method of storage or communication is completely risk-free. Clients should avoid sending more sensitive information than necessary through ordinary messaging and should contact me if they wish to discuss an alternative way to provide information.

10 Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to ask for access to personal information, correction of inaccurate information, deletion, restriction, objection, or transfer of information you provided in a portable format. Where processing is based on consent, you may withdraw that consent. These rights are not absolute, and an exemption or overriding legal, safeguarding, professional or record-retention requirement may apply.

A young person's personal information belongs to the young person for data-protection purposes. A parent or guardian may exercise rights on the young person's behalf where this is appropriate, taking account of the young person's age, understanding, wishes, best interests and the nature of the information.

To make a request, email hello@jessieway.co.uk or telephone 07444 326424. I may need to confirm identity before releasing information. I will respond without undue delay and normally within one month, subject to the rules that permit an extension for a complex or numerous request.

11 Cookies and website information

My website uses cookies and similar technologies needed for it to function and may use optional technologies only where an appropriate choice has been provided. Details of the technologies in use, their purposes, durations and available controls are set out in the separate Cookie Policy and cookie-consent settings on the website.

12 Questions and complaints

Please contact me first if you have a question or concern about how I use personal information. I will take the concern seriously and try to resolve it.

Jessie Way
Telephone 07444 326424
Email hello@jessieway.co.uk

You may also complain to the Information Commissioner's Office if you remain dissatisfied.

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone 0303 123 1113
Website ico.org.uk/make-a-complaint

13 Changes to this notice

I will review this notice when the practice, technology, service providers or legal and professional requirements change. The current version and effective date will be published on my website. The notice will be updated before digital audio products are offered for sale so that the selected sales and payment services are described accurately.