

Privacy Policy

Effective information for website visitors and clients

Last updated: 23 October 2026

1. Introduction

Your privacy and confidentiality are important to me.

This Privacy Policy explains how I collect, use, store and protect personal information when you visit my website, make an enquiry, book a session, subscribe to a service or work with me therapeutically.

I aim to handle your information responsibly, respectfully and transparently, in accordance with applicable UK data-protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who is responsible for your information?

What Makes It Happen is operated by **Graham Barrone**, a sole trader providing online psychotherapy, hypnotherapy, past-life regression and related services.

I am the data controller for personal information collected and used in connection with these services. This means I am responsible for deciding how and why that information is processed.

For privacy enquiries or requests concerning your personal information, please contact:

Email: hello@whatmakesithappen.com

3. What information I collect

The information I collect depends on how you interact with my website and services.

Website visitors and enquiries

This may include:

- Your name and email address.
- Your telephone number, if you choose to provide it.
- Information you include in enquiry forms, emails or website chat messages.
- Basic technical information associated with website visits, such as device information, browser type, IP address and website usage data.

Clients using therapeutic services

Where relevant, I may also hold:

- Appointment and booking information.
- Information you voluntarily share about your personal circumstances, experiences, relationships, emotional well-being and health.

- Relevant clinical observations, working notes and session summaries.
- Private Messaging conversations.
- Relevant Zoom chat messages.
- Records of consent, agreements and communications about your therapy.
- Payment and transaction records.

Some information shared during therapy may be classified as special category personal data under UK GDPR. This includes information about physical or mental health and other sensitive aspects of your personal life.

I do not routinely require a home address, GP details or emergency-contact information when someone books a session.

I ask clients to provide information relevant to our work rather than collecting unnecessary personal details.

4. Why I use your information

I process personal information for the following purposes:

- Responding to enquiries and providing information about my services.
- Arranging and managing appointments.
- Providing psychotherapy, hypnotherapy and related therapeutic services.
- Delivering and administering Private Messaging subscriptions.
- Maintaining appropriate and confidential client records.
- Processing payments, refunds and subscriptions.
- Maintaining continuity and quality of therapeutic care.
- Providing professional supervision while respecting client confidentiality.
- Meeting accounting, legal and regulatory obligations.
- Managing website functionality, security and performance.
- Sending occasional marketing communications where permitted.
- Responding to complaints and protecting legitimate legal interests.

I do not sell client information to advertisers or use confidential therapy records for advertising or behavioural profiling.

5. My legal basis for processing information

Under UK GDPR, I must have a lawful basis for using personal information.

Depending on the purpose, I rely on:

Contract - Article 6(1)(b)

Where processing is necessary to arrange, provide or administer services you have requested.

Legal obligation - Article 6(1)(c)

Where I must retain or disclose certain information to comply with applicable law, including tax and accounting requirements.

Legitimate interests - Article 6(1)(f)

Where necessary and proportionate for the responsible operation and protection of my practice, including responding to enquiries, maintaining appropriate records, website security, handling complaints and establishing or defending legal claims.

Consent - Article 6(1)(a)

Where consent is the appropriate basis, including certain marketing communications and optional activities.

Sensitive therapeutic information

Information about your health and other sensitive personal matters receives additional legal protection.

For sensitive information required in therapy, I rely on your **explicit consent under Article 9(2)(a)** of UK GDPR, which I seek as part of the agreement to work together.

Where legally applicable, different conditions may permit limited processing, including where necessary for legal claims.

You may withdraw consent, although this will not make earlier lawful processing invalid. If information is essential to providing therapy and no alternative lawful condition applies, withdrawing consent may affect my ability to continue the service.

Optional uses of information, such as AI-assisted summaries, are considered separately.

6. Confidentiality and therapeutic records

Confidentiality is fundamental to my therapeutic practice.

Information shared in therapy is treated as private and is not ordinarily disclosed to other people.

I may maintain relevant notes, observations, summaries or records to support continuity of care and responsible professional practice.

These records may include my own reflections and clinical observations rather than a word-for-word account of what has been discussed.

Confidentiality is not absolute. In exceptional circumstances, I may need to disclose limited relevant information where required by law, where justified to address a serious risk of harm, or where necessary for legal proceedings.

Where appropriate and lawful, I will discuss such disclosure with you first.

7. Online sessions and Zoom

Online therapy sessions are conducted through Zoom.

Zoom processes information necessary to provide video meetings, including audio, video, meeting information and any messages shared using its chat facilities.

Relevant chat messages may remain within Zoom. Where appropriate, I may select material from a conversation and save it in your confidential client records.

I do not routinely distribute session content to third parties.

Zoom operates under its own privacy and security arrangements, which may involve processing information outside the United Kingdom.

AI-assisted session summaries

I may offer to use Zoom's AI Companion to produce a summary of a session.

This feature is not automatically activated for my therapy sessions.

I will only activate AI-assisted summaries after discussing them with you and receiving your explicit agreement.

You are free to decline or ask for the feature to be stopped. Doing so will not prevent you from receiving therapy.

Where AI-assisted summaries are used:

- Zoom may process meeting content to produce the summary.
- Processing may involve third-party AI service providers and facilities outside the UK.
- Zoom states that customer meeting content is not used to train Zoom's or third-party AI models.
- AI-generated summaries may contain errors or misunderstandings.
- I review summaries before relying on them as part of your therapeutic record or sharing them with you.

Where appropriate, reviewed summaries may form part of your confidential client record.

If you decline AI-assisted summaries, I may instead maintain my own relevant clinical notes.

Any proposed session recording would require a separate discussion and agreement.

8. Private Messaging services

Where you subscribe to Private Messaging, your written conversations form part of the therapeutic relationship.

Messages may include sensitive personal information and are therefore treated as confidential therapeutic records.

They are used to provide the messaging service, maintain continuity of care and support professional record-keeping.

Cancelling or pausing a subscription does not automatically mean the associated therapeutic records will be deleted.

These records are subject to the retention arrangements described below.

Private Messaging is not an emergency or crisis-response service.

9. Professional supervision

Professional supervision is an important part of responsible therapeutic practice.

I may discuss aspects of client work with an appropriately qualified professional supervisor to reflect on my practice and maintain professional standards.

Such discussions are conducted confidentially.

I minimise identifying information and do not deliberately identify clients unnecessarily. A client's first name may occasionally be used, but I do not routinely provide identifiable client files, session transcripts or AI-generated summaries to my supervisor.

10. Website chat and AI assistance

My website uses Wix Smart Chat, which may provide automated responses to general questions about my services.

Conversations may be processed by Wix and relevant technology providers and may be available for me to review through the Wix dashboard.

The website assistant is intended to provide general information and help visitors navigate the website.

It is not a psychotherapy service, a confidential therapy session or an emergency support service.

Visitors are encouraged not to share sensitive personal information, detailed mental-health histories or confidential therapeutic material through the website assistant.

Information supplied through website chat may be used to respond to enquiries and improve the operation of the website assistant.

Where a website conversation develops into a therapeutic enquiry or relationship, relevant correspondence may be retained under the appropriate client-record category.

11. Payments and financial information

Payments for sessions, packages and subscriptions are handled through the payment services available on my website, including Wix-supported payment providers.

I do not personally receive or store your full debit or credit card details.

Payment providers process the information necessary to authorise and complete transactions under their own security and privacy arrangements.

I may retain limited transaction information, including payment amounts, dates, booking references, invoices and refund records, for accounting and administrative purposes.

12. Where information is stored and who may process it

I use selected third-party services to operate my practice.

These include:

Wix - website hosting, enquiries, bookings, subscriptions, payments, customer communications and Smart Chat.

Google Workspace - email communications and associated administration.

Zoom - online sessions, meeting communications and optional AI-assisted summaries.

Apple iCloud - storage of selected confidential client files and records.

Payment service providers - processing payments and refunds.

These organisations may process information on my behalf or act as independent data controllers for certain activities.

I use service providers for legitimate operational purposes and do not authorise the sale of confidential therapeutic records.

Relevant information may also be disclosed where legally necessary to professional advisers, accountants, legal representatives, regulators or public authorities.

13. International data transfers

Some of the technology providers I use operate internationally.

As a result, personal information may be stored, accessed or processed outside the United Kingdom, including in the United States.

Where UK data-protection law restricts international transfers, those transfers must be covered by an appropriate legal mechanism. Depending on the provider and destination, this may include UK adequacy regulations or recognised contractual safeguards.

Further information about the arrangements used by individual providers can be requested using the contact details above.

14. How long information is retained

I aim to keep personal information only for as long as it is reasonably necessary for the purpose for which it was collected.

My general retention arrangements are:

Client and therapeutic records - 5 years

Client notes, relevant correspondence, Private Messaging conversations and retained session summaries are normally kept for five years after the therapeutic relationship ends.

General enquiries - 12 months

Enquiries that do not develop into a therapeutic relationship are normally retained for up to 12 months after the last relevant communication.

Website assistant conversations - 90 days

Routine website-assistant conversations are intended to be reviewed and removed within 90 days where they are no longer required, subject to available platform controls and any legitimate need to retain relevant communications.

Financial and accounting records

Financial records are retained for the period required by applicable tax and accounting legislation. For self-employed individuals, this is generally at least five years after the relevant 31 January Self Assessment filing deadline.

Website accounts and marketing records

Basic website membership information may be retained while an account remains active or while there is another appropriate reason to retain it. Marketing contact details are retained while there is a valid basis for contacting the individual, subject to periodic review.

I may retain limited records of withdrawal of consent or marketing objections to ensure those preferences continue to be respected.

Retention periods may be extended where reasonably necessary in connection with a complaint, legal claim, safeguarding matter or statutory obligation.

Deletion from an active system may not immediately remove information from all provider backups, which may remain subject to the provider's backup-retention arrangements.

Anonymised information

I may retain genuinely anonymised material for professional reflection, learning or service development.

This requires removing or changing identifying details sufficiently to ensure that an individual cannot reasonably be identified, including through the combination of contextual information.

Simply removing a person's name does not necessarily make a transcript anonymous.

Where material remains identifiable, the ordinary data-protection and retention requirements continue to apply.

15. How information is protected

I take reasonable technical and organisational precautions to protect personal information against unauthorised access, alteration, loss or disclosure.

These include using access-controlled accounts, appropriate authentication, device security and the security features provided by the services I use.

I limit access to confidential client information to what is necessary for the operation of my practice.

No electronic communication or storage system can be guaranteed completely secure. I therefore take care to minimise the information collected and to use it only for appropriate purposes.

16. Marketing communications

I may occasionally send information about my services, publications, journals, articles and other relevant developments.

Marketing emails are sent only where there is a valid basis under applicable data-protection and electronic-marketing rules, such as appropriate consent or a qualifying existing-customer arrangement.

Being a website member or former client does not, by itself, mean that you have agreed to receive marketing.

You can opt out of marketing communications at any time using the unsubscribe option provided or by emailing me.

Unsubscribing from marketing will not affect necessary communications relating to bookings, payments or an existing therapeutic relationship.

17. Cookies and website analytics

My website uses Wix and associated technologies that may place cookies or similar technologies on your device.

These can support website functionality, security, booking processes, preferences and website analytics.

I use Wix's website analytics facilities and may use Google Analytics where it is enabled.

Strictly necessary technologies are used to operate the website. Other technologies are subject to applicable consent or objection requirements.

Where consent is required for non-essential cookies, they should not be activated before that consent is given.

You can manage cookies through the website's available privacy controls and through your browser settings.

Further information about the cookies in use should be provided through the website's cookie preferences or cookie information.

18. Your data-protection rights

Under UK data-protection legislation, you may have the right to:

- Request access to personal information held about you.
- Ask for inaccurate information to be corrected.
- Request deletion of information in circumstances where the right applies.
- Request restriction of certain processing.
- Object to certain uses of your information.
- Request transfer of eligible information to another provider.
- Withdraw consent where processing relies on consent.
- Raise concerns about the way your information is handled.

These rights are subject to applicable legal conditions and exceptions.

For example, a request to delete information does not always require the deletion of records that must lawfully be retained.

Requests can be made by emailing:

hello@whatmakesithappen.com

I may need to verify your identity before providing access to confidential information.

I will respond in accordance with the applicable legal time limits, normally within one month for a data-subject rights request, subject to permitted extensions or exceptions.

19. Complaints about your personal information

If you have a concern or complaint about how your information has been handled, please contact me using the email address above.

I will acknowledge data-protection complaints within 30 days, investigate them appropriately and communicate the outcome without undue delay.

You also have the right to raise concerns with the **Information Commissioner's Office (ICO)**, the UK's independent data-protection regulator.

Website: <https://ico.org.uk>

20. Links to other websites

My website may contain links to external websites and services, including third-party booking, publishing, retail or payment platforms.

Those websites may collect and process information under their own privacy policies.

I encourage you to review the privacy information provided by any external service you choose to use.

21. Services for adults

My therapeutic services are intended for people aged **18 and over**.

I do not knowingly provide therapy services to children through this website.

If I become aware that personal information has been collected from a child inappropriately, I will take appropriate steps to address the situation.

22. Changes to this policy

I may update this Privacy Policy to reflect changes in my services, technologies, working practices or legal obligations.

The latest version will be published on my website with an updated revision date.

Where a change materially affects how personal information is used, I will provide additional information where required.

23. Contact

For questions about this policy, requests concerning your information or concerns about confidentiality, please contact:

Graham Barrone

Trading as What Makes It Happen

Email: hello@whatmakesithappen.com

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