

PRACTICE PRIVACY NOTICE

Biops psychoanalysis® Integrative Psychotherapy

Dr. Melania Anna Duca

Last updated: August 2026

1. Introduction

Dr. Melania Anna Duca, trading as Biops psychoanalysis® Integrative Psychotherapy, is committed to protecting your privacy and handling personal information responsibly, lawfully and transparently. This Privacy Notice explains what personal information may be collected, why it is collected, how it is used and protected, when it may be shared, how long it may be retained, and your rights in relation to it.

This notice applies to clients and prospective clients who contact or receive services from the practice, including individual psychotherapy, couples therapy, clinical assessment, professional reports and associated therapeutic services.

2. Data Controller

For the purposes of UK data protection legislation, the Data Controller is:

Dr. Melania Anna Duca

Biops psychoanalysis® Integrative Psychotherapy

Psychotherapy Department, Orthoderm Private Medical Clinic

2 Ballynahinch Road, Royal Hillsborough, BT26 6AR, United Kingdom

Email: info@drmelaniaduca.uk

Website: drmelaniaduca.uk

Telephone/WhatsApp: +44 75545 20771

ICO Registration: ZB746996

Questions about this Privacy Notice or the handling of your personal information should be directed to Dr. Duca using the contact details above.

3. Information I May Collect

Depending on your circumstances and the services received, information may include your identity and contact details; date of birth; address and location; GP or other healthcare details where relevant; emergency contact details; appointment and attendance information; correspondence; payment and transaction information; referral and assessment information; clinical and therapeutic notes; physical and psychological health information; medication and treatment information; relevant personal, family, relationship, occupational and social history; risk, safeguarding or vulnerability information; and information contained in reports, letters or documents supplied by you or appropriate third parties.

Psychotherapy involves information of a sensitive nature. Clinical information will commonly constitute **special category personal data**, particularly health information. Depending on what you choose to discuss, records may also contain other sensitive personal information. The practice seeks to collect and retain only information reasonably necessary for providing, administering and safeguarding the therapeutic service.

4. How Information Is Obtained

Most information is obtained directly from you when you make an enquiry, book an appointment, complete a consent or assessment form, attend therapy or assessment, communicate with the practice, or provide relevant documents. Information may occasionally be received from a referring organisation, healthcare professional, employer-sponsored assistance programme or another professional involved in your care where there is an appropriate basis for receiving it.

5. Why Your Information Is Used

Information may be processed to respond to enquiries; arrange and manage appointments; provide psychotherapy, assessment and associated services; maintain appropriate clinical records; communicate about therapy; monitor therapeutic progress; manage risk and safeguarding concerns; contact an emergency contact or appropriate service where justified; prepare reports or professional correspondence where requested or authorised; process payments and maintain financial records; meet professional, insurance, accounting, regulatory and legal obligations; establish, exercise or defend legal claims; and maintain the security and integrity of the practice.

6. Lawful Basis for Processing

Different lawful bases may apply to different activities. These may include **contract**, where processing is necessary to provide requested professional services or take steps before entering a therapeutic agreement; **legal obligation**, where information must be processed or retained to comply with applicable requirements; **legitimate interests**, where reasonably necessary for the proper administration, security and protection of an independent psychotherapy practice and those interests do not override your rights; and **vital interests** in exceptional circumstances where processing is necessary to protect someone's life.

Where special category information is processed, an appropriate condition under Article 9 UK GDPR and applicable UK data protection legislation will also be identified and documented. Where consent is specifically relied upon for a particular processing activity, it may be withdrawn at any time without affecting processing that was lawful before withdrawal. Consent to receive psychotherapy is distinct from consent used as a data-protection lawful basis.

7. Confidentiality

Information disclosed during psychotherapy is treated as confidential. Confidentiality may be limited where you authorise disclosure; disclosure is required by law or lawful order; safeguarding obligations apply; there is a serious concern regarding risk of harm to you or another person; disclosure is necessary for the establishment, exercise or defence of legal claims; or another lawful and professionally justified basis exists. Where reasonably possible and appropriate, such matters will be discussed with you before disclosure.

Clinical material may be discussed confidentially within professional clinical supervision for the purpose of maintaining safe, ethical and effective practice. Identifying information will be minimised wherever reasonably possible.

8. Sharing Your Information

Personal information is not sold. It may be shared only where reasonably necessary and where an appropriate legal and professional basis exists. Potential recipients may include healthcare professionals involved in your care; emergency or safeguarding services; professional clinical supervisors; legal or accounting advisers where necessary; regulatory, professional or statutory bodies; referring organisations where this forms part of the agreed service; and technology or administrative service providers supporting the practice. Service providers are expected to process information only for authorised purposes and with appropriate safeguards.

9. Electronic Communications and Online Therapy

The practice may use email, telephone, video communication, WhatsApp and other agreed electronic systems to provide and administer services. No electronic system can be guaranteed to be entirely free from risk. Clients are encouraged to consider their own privacy when communicating electronically and to attend online therapy from a suitably private and secure environment wherever reasonably possible. Routine electronic communications are not an emergency or crisis service.

10. Technology Used by the Practice

The practice is operated solely by Dr. Duca. Clinical and administrative information is accessed through password-protected computing, tablet and mobile devices used by Dr. Duca for authorised purposes. Professional email and associated services are provided through Google Workspace, and online appointments may use Google Meet and Calendly or other appropriately selected practice-support services.

For security reasons, this public notice does not provide a detailed inventory of individual hardware or network infrastructure. The practice maintains appropriate internal awareness of the systems and services through which personal information may be processed.

11. Optional AI-Assisted Clinical Documentation

The practice may offer an AI-assisted note-taking or documentation facility during an online therapy session for the limited purpose of assisting with the preparation of the clinical session record.

Use is optional and session-specific. The facility is used only when the client agrees to its use for that individual session. When activated, the service displays a notification during the video call and Dr. Duca draws the client's attention to it. A client may decline or withdraw agreement to the use of the facility without affecting their ability to receive therapy.

Where used, information discussed during the session may be temporarily processed to generate a transcript and/or assist in preparing a clinical record. The practice does not use AI-generated output as a substitute for clinical judgement. The resulting clinical record is reviewed and remains subject to the same confidentiality and data-protection safeguards as other clinical records.

Temporary transcripts are deleted by the practice as soon as the relevant clinical report or session record has been generated and reviewed. The practice does not intentionally retain the transcript as a separate clinical record. Third-party technology providers may process information in accordance with their contractual processing arrangements, retention mechanisms and applicable data-protection safeguards. Clients may ask for further information about the technology used before deciding whether to agree to its use.

12. International and Online Services

Therapeutic services may be provided remotely to clients outside the United Kingdom where professionally and legally appropriate. Where service providers process or transfer personal information internationally, appropriate safeguards will be considered and used where required by applicable law. Clients receiving online therapy should inform Dr. Duca of their physical location during a session where it differs materially from their usual location, particularly where this may become necessary for safeguarding or emergency purposes.

13. Data Security

Reasonable technical and organisational measures are used to protect personal information against unauthorised access, disclosure, alteration, accidental loss or destruction. Devices used to access practice information are password protected and used only by Dr. Duca. Access to identifiable clinical and administrative information is restricted to what is reasonably necessary for professional purposes. Particular care is taken with clinical information because of its sensitive nature.

14. Retention and Destruction of Clinical Records

The practice follows a data-minimisation and storage-limitation approach and does not retain identifiable clinical information indefinitely or merely because it might conceivably be useful in the future.

There is no single fixed retention period imposed by UK data protection law for all personal information. The appropriate period depends upon the purpose for which the information is held and any continuing legal, professional, safeguarding, insurance or claims-related reason for retaining it.

Following the conclusion of therapy, clinical records will be reviewed and may be securely destroyed when they are no longer reasonably necessary. Where appropriate, and subject to any continuing lawful or professionally justified reason for retention, the practice's preference is to minimise post-therapy retention rather than retain detailed clinical material routinely for an arbitrary period.

Clients may request erasure of their clinical records at any time. Requests will be considered under applicable data-protection law and will ordinarily be honoured where there is no continuing lawful reason to retain the information. The right to erasure is not absolute. Certain information may need to be retained where necessary to comply with a legal obligation, address safeguarding concerns, respond to an existing or reasonably anticipated complaint, satisfy an applicable insurance requirement, or establish, exercise or defend legal claims.

When information is no longer required, it will be securely deleted, destroyed or anonymised as appropriate. Where technically unavoidable copies remain temporarily within backup systems, they will not be intentionally restored or used for ordinary purposes and will be allowed to expire or be overwritten in accordance with the relevant system's processes.

15. Insurance and Record Retention

The practice holds professional indemnity and malpractice insurance. In some circumstances, information may need to be retained where this is reasonably necessary to comply with applicable insurance requirements or in connection with an actual or reasonably anticipated complaint, claim or legal proceeding. Information will not be retained for these purposes for longer than is reasonably necessary.

16. Your Data Protection Rights

Depending on the circumstances and lawful basis, you may have rights including the right to be informed; access your personal information; request correction; request erasure in certain circumstances; request restriction; data portability where applicable; object to certain processing; rights relating to automated decision-making where applicable; and withdraw consent where processing is based on consent. These rights are not absolute and may be subject to lawful exemptions or limitations. Requests may be made using the contact details in this notice and will not ordinarily attract a fee.

17. Right to Object

Where personal information is processed on the basis of legitimate interests, you have the right to object. Whether processing must cease depends upon the circumstances and applicable law. Objections may be sent to info@drmelaniaduca.uk.

18. Automated Decision-Making

The practice does not use solely automated decision-making or profiling to make decisions about the provision of psychotherapy that produce legal or similarly significant effects. AI-assisted documentation, when used with session-specific agreement, assists record preparation and does not independently make clinical decisions about clients.

19. Complaints About Data Protection

If you have concerns about the handling of your personal information, you are encouraged to contact Dr. Duca first so the matter can be considered. You also have the right to raise a concern with the Information Commissioner's Office (ICO). Website: ico.org.uk. Your right to approach the ICO is not affected by contacting the practice first.

20. Third-Party Websites and Services

The practice website or communications may contain links to independent third-party websites or services. The practice is not responsible for the privacy practices of independent third parties. You should review their privacy information before providing personal information directly to them.

21. Changes to This Privacy Notice

This Privacy Notice may be reviewed and updated periodically to reflect changes in the practice, technology, professional requirements or applicable law. The current version will be made available through the practice website.

Biopschoanalysis® Integrative Psychotherapy

Dr. Melania Anna Duca

NCIP Fellow and Clinical Supervisor - NCIP305739

ICO Registration ZB746996

info@drmelaniaduca.uk

drmelaniaduca.uk