

# Data processing agreement

**Date: February 16, 2025**

**Version: 1.0.1**

Indre Brinkyte/ Authentic Therapy is responsible for the processing of personal data as shown in this privacy statement.

I understand how important your privacy is. I take great care to maintain your confidentiality in line with current data protection laws, including GDPR, NEN 7510, and HIPAA, as well as the ethical guidelines of NIP. Processing of personal data is done with care in accordance with the requirements of the General Data Protection Regulation (GDPR) as of 25 May 2018. For proper treatment, it is necessary that I, as your treating therapist, create a file. This is also a legal obligation imposed by the Medical Treatment Agreement Act (WGBO/Wkkgz). These regulations are designed to protect your personal information and ensure that your therapist upholds professionalism and integrity.

## How Your Information Is Used

To provide you with the best possible therapy services, I collect and store certain personal information, including:

- Your name, email address, and session notes (eg, personal history, therapy progress, reports, and treatment outcomes).
- Contact details for your GP and emergency contact .
- Your address or date of birth, which for example may be shared with authorities in case of a serious safety concern. These details are also necessary for invoicing.
- Your emergency contact number , which for example may be used if you miss a session following discussions about self-harm or suicidal thoughts.

I collect this information solely to support your therapy and ensure your well-being. Your data will never be shared with third parties\* without your explicit consent and will not be used for research purposes.

- \* The data of your file might be used for observation. Legally, it is required to ensure that continuous care and observation are in place to protect your well-being. If I am no longer able to continue working with you, due to incapacitation or death, I will make sure another qualified professional takes over your care to ensure that your progress isn't interrupted. The new professional will contact you, review your treatment plan, observe your progress, and continue supporting your needs; or if necessary refer to another professional. All personal information will remain confidential. In that case new professional will maintain the obligation to keep your file for 20 years.
- A small part of the data from your file is used for financial administration, so that I or my administrator can draw up an invoice.

At the beginning of your first appointment I will ask you to complete a personal details form containing your name, address, date of birth, contact information and also contact information for your GP.

## Your Rights

You have the right to:

- Withhold consent without it affecting the therapy services provided to you.
- Request access to your personal data at any time.
- Ask for corrections or deletions of your personal data if it is inaccurate or no longer needed, unless legal requirements prevent deletion.

If you want to do any of the above will send you request form.

## How Your Data Is Stored & Protected

- Your data is securely stored on the Mijndiad platform .Mijndiad satisfy security requirements
- EAP Clients : Communication will be limited to the platform.

- Private Clients: Video sessions will take place via Signal or [Doxy.me](https://doxy.me) or other secure platform, and communication between sessions will be through Mijndiad or secure email messaging.

## Retention & Legal Requirements

- Dutch law requires that psychologists keep client records for at least 20 years after treatment ends.
- If you request data deletion, I will provide a written confirmation once processed.
- Information will only be shared if legally required, and only the minimum necessary details will be provided.

## Data Breach & Confidentiality Exceptions

- Any data breaches will be reported to the relevant authorities within 72 hours.
- If a client poses a risk to themselves or others, I may be legally required to break confidentiality to prevent harm. This decision will be made carefully and may involve consultation with legal or professional bodies.

If you have any questions, please feel free to contact me.

## Cooperation with other organizations

In practice, I work together with the following organizations with regard to the processing of your data and I have entered into a processing agreement with them:

- wix (website hosting platform)
- [proton.me](https://proton.me) (email service)
- mijndiad (secure website where your data is stored)

## Cookies

- My website (authentic therapy) uses cookies and Google Analytics. Almost all websites use cookies which are small files that get put on your computer by websites as you surf them. These cookies can store lots of information which can have privacy implications. Google Analytics is a service provided by Google that gathers anonymous data on how people are using websites and then provides visitor statistics, details of page views etc. This service is used by many website owners as the data helps website owners to improve their websites. A cookie is placed via this website by the American company Google, as part of the "Analytics" service. I use this service to track and receive reports on how visitors use the website. Google may provide this information to third parties if Google is legally obliged to do so, or if third parties process the information on behalf of Google. I have no influence on this. I have not allowed Google to use the obtained analytics information for other Google services. The information that Google collects is anonymized as much as possible. Your IP address is explicitly not provided. The information is transferred to and stored by Google on servers in the United States. Google states that it adheres to the Safe Harbor principles and is affiliated with the Safe Harbor program of the US Department of Commerce. This means that there is an adequate level of protection for the processing of any personal data.
- Cookies Social Media This website contains buttons to promote ("like") or share web pages on social networks such as Facebook and Instagram. These buttons work by means of pieces of code that originate from Facebook and Instagram themselves. Cookies are placed by means of this code. I have no influence on that. Read the privacy statement of Facebook, Instagram and Google (which can change regularly) to read what they do with your (personal) data that they process via these cookies. The information they collect is anonymized as much as possible. The information is transferred to and stored by Facebook, Instagram and Google on servers in the United States. Facebook, Instagram and Google state that they adhere to the Safe Harbor principles and are affiliated with the Safe Harbor program of the US Department of Commerce. This means that there is an appropriate level of protection for the processing of any personal data.  
I also work with Facebook pixels, which allows us to tailor the information and content I share and the advertisements I use to your interests based on your website visit.
- Some page elements are embedded from trusted third parties in order to provide you with Interactive Maps. This makes the website more helpful to you as a site visitor however most of these come with their

own cookies. This applies to Google Maps. I do not control these cookies so I cannot guarantee what they do. In many cases the cookies are used to generate identical information to Google Analytics and indeed use Google Analytics, so opting-out of Google Analytics will also opt you out of these cookies too. You can opt out of Google analytics and other Google services here <http://tools.google.com/dlpage/gaoptout> and <https://www.google.com/dashboard/>.

- Use of permanent cookies : With the help of a permanent cookie, you are recognizable when you visit the website again. The website can therefore be set specifically to your preferences. Even when you have given permission for the to repeat your preferences every time, which saves you time and allows you to make more pleasant use of our website. You can delete permanent cookies via the settings of your browser. placement of cookies, we can remember this by means of a cookie. This means that you do not have

## Changes to privacy

This privacy notice may be updated from time to time, so please check occasionally for any updates.

## Confidentiality

I acknowledge that during treatment, there may be private and sensitive information that you share. Please be assured that all of my services are strictly confidential, and any information that you disclose will be kept between us in confidence. All third-party service providers are aware of confidentiality obligations.

Breaking confidentiality: The only situations in which confidentiality will be breached without your approval are:

- there is an immediate and serious risk of harm or danger to the you or others: I am required by law to disclose confidential information to appropriate third parties, such as medical professionals, family members, or the authorities, in order to ensure the safety of the patient or others.
- Supervision and intervison: During these professional activities, I may need to share information about clients in order to receive feedback or guidance on my work. However, when sharing this information, I am required to maintain the confidentiality of clients to the greatest extent possible. This means that I am expected to use pseudonyms or other identifying information that will not reveal the true identity of the client.
- I am ordered to do so by a judge or other legal authority. As psychologists, I am bound by strict guidelines when disclosing confidential information in response to a request by a judge or other legal authority. These guidelines are set out by the Dutch Professional Association of Psychologists (NIP). The guidelines stipulate that I should only disclose the minimum amount of information necessary to comply with the request, and that the disclosure should be limited to information that is directly relevant to the legal case.

Prior to breaching confidentiality in any situation, I will make every effort to communicate with you and obtain your consent. In cases where informed consent cannot be obtained, I may still be required to disclose confidential information, but only after careful consideration and consultation with colleagues, legal experts, and the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). I must also keep detailed records of any disclosures made, including the date, time, and purpose of the disclosure, as well as the identity of the professionals to whom the information was disclosed.

## Changes to the privacy statement

This privacy statement was last modified on 16-02-2025.

Authentic therapy may amend this privacy statement. New versions are always posted on the website. We therefore recommend that you consult this statement regularly so that you stay informed of changes.

I confirm that I consent to therapists storing my personal information and records of my therapy sessions for the purposes of running their service, for the duration outlined above and in their privacy policy.

I understand that I can revoke this consent at any time.

[handtekening]

[naam ondertekenaar]

[datum ondertekenen]