ENDELEO COUNSELLING THERAPY

Privacy Policy

Your Privacy and Data Protection

Effective Date: January 1, 2022 | Last Updated: September 1, 2026

Your Privacy Matters to Us

At Endeleo Counselling Therapy, we are committed to protecting your privacy and ensuring the confidentiality of your personal and therapeutic information. This Privacy Policy explains how we collect, use, protect, and share your information when you use our services.

1. Information We Collect

Personal Information

- Full name and contact details
- Date of birth and age
- Phone number and email address
- Emergency contact information
- Payment information and transaction details
- Username and account credentials

Therapeutic Information

- Session notes and treatment plans
- Mental health history and assessments
- Goals and progress tracking
- Appointment scheduling preferences
- Communication preferences
- Therapist-client interaction records

Website Usage:

- IP address and device information
- Browser type and version
- Pages visited and time spent
- Cookies and similar technologies

Platform Activity:

- Login times and frequency
- Feature usage patterns
- Error logs and technical issues
- Session recordings (virtual sessions) - With your consent

2. How We Use Your Information

Primary Therapeutic Purposes

- Providing personalized therapy and counselling services
- Developing and implementing treatment plans
- Tracking progress and adjusting therapeutic approaches
- Maintaining continuity of care across sessions
- Coordinating with healthcare providers when necessary

Administrative Functions

- Scheduling and managing appointments
- Processing payments and maintaining financial records
- Sending appointment reminders and confirmations
- Providing customer support and technical assistance
- Managing therapist-client assignments

Service Improvement & Platform Integrity

- Analyzing usage patterns to improve our platform
- Developing new features and services
- Conducting research (with explicit consent)
- Quality assurance and training purposes
- Ensuring platform security and preventing fraud

3. Information Sharing and Disclosure

Confidentiality Commitment

We do **NOT** sell, rent, or share your personal information for commercial purposes. Your therapeutic information is strictly confidential and protected under professional counselling standards.

We may share information only in these specific situations:

With Your Consent

- Referrals to other healthcare providers
- Insurance claim processing
- Family therapy involving multiple clients
- Research participation (optional)

Legal Requirements

- Court orders and legal proceedings
- Mandatory reporting (child/elder abuse)
- Imminent danger to self or others
- Public health emergencies

Trusted Service Providers

We work with trusted third-party service providers who assist us in securely delivering clinical services:

- Payment processors (M-Pesa, banks)
- Cloud storage providers
- Video conferencing platforms
- IT support and maintenance
- Email and messaging services
- Security monitoring services

Note: All service providers are bound by strict confidentiality agreements and data protection requirements.

4. Data Security and Protection

We maintain comprehensive security controls to safeguard your confidential records:

Technical Safeguards

- End-to-end encryption for all sensitive data
- SSL/TLS encryption for data transmission
- Secure cloud storage with backup systems
- Firewall protection and intrusion detection
- Regular security updates and patches
- Data anonymization for analytics
- Secure video conferencing platforms

Physical & Administrative

- Role-based access with multi-factor authentication
- Restricted access to physical facilities
- Background checks for all staff
- Confidentiality agreements and training
- Incident response and breach protocols
- Regular staff training on privacy practices
- Secure disposal of physical documents
- Continuous monitoring and security assessments

5. Your Privacy Rights and Choices

You Have the Right To:

- **Access Your Information:** Request copies of your personal and therapeutic records
- **Correct Information:** Update or correct inaccurate personal information
- **Delete Information:** Request deletion of your personal data (subject to legal requirements)

How to Exercise Your Rights

To exercise any of these rights, please contact us using the information provided in Section 8. We will respond to your request within 30 days and may require identity verification.

Note: Some rights may be limited by legal or ethical obligations, particularly regarding therapeutic records

- **Data Portability:** Receive your data in a portable format for transfer
- **Withdraw Consent:** Revoke consent for optional data processing activities
- **File Complaints:** Report privacy concerns to us or regulatory authorities

required for continuity of clinical care.

6. Data Retention and Storage

Therapeutic Records

- **Active clients:** Records maintained during treatment
- **Completed therapy:** 7 years minimum retention
- **Minor clients:** Until age 25 or 7 years, whichever is longer
- **Legal requirements:** Extended retention if legally required

Administrative Data

- **Account information:** Until account deletion
- **Payment records:** 7 years for tax purposes
- **Communication logs:** 3 years maximum
- **Technical logs:** 1 year for security purposes

Secure Disposal Process

When retention periods expire, we securely delete or destroy your information using industry-standard methods:

Digital Destruction:

- Secure cryptographic deletion
- Multi-pass data overwriting
- Backup system purging

Physical & Compliance:

- Professional shredding services
- Certificate of secure destruction
- Deletion confirmation logs & audit trails

7. Cookies and Online Tracking

What Are Cookies?

Cookies are small text files stored on your device when you visit our website. They help us provide you with a better experience and improve our services.

Types of Cookies We Use:

Cookie Management

You can control cookies through your browser settings. However, disabling essential cookies may affect website functionality and prevent appointment booking.

- **Analytics Cookies (optional):** Usage statistics, performance monitoring, feature tracking, and error identification

8. Contact Information and Data Protection Officer

Questions About Your Privacy?

If you have questions about this Privacy Policy, want to exercise your privacy rights, or have concerns about how we handle your information, please contact us:

General Privacy Inquiries:

Email: info@endeleocounsellingtherapy.co.ke

Phone: +254 708 092290

Location: Corner House, 11th Floor, Kimathi Street, Nairobi, Kenya

Data Protection Officer:

Name: Carmillah Edalia, Data Protection Officer

Email: carmillah@endeleocounsellingtherapy.co.ke

Response Time: Within 30 days.

Regulatory Authority:

If you believe we have not adequately addressed your privacy concerns, you have the right to file a complaint with:

Office of the Data Protection Commissioner - Kenya

Website: www.odpc.go.ke

Email: complaints@odpc.go.ke

9. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors.

How We Notify You:

- Email notifications to active clients
- Platform notifications upon login
- Website banner announcements
- Updated "Last Modified" date

Your Options When Policy Changes:

- **Continue using our services:** Indicates acceptance of updated terms
- **Contact us with questions:** We'll explain any changes in detail
- **Exercise your rights:** Request data deletion if you disagree with changes
- **Discontinue services:** You may stop using our platform at any time

10. International Data Transfers

Your data is primarily stored and processed in Kenya. However, some of our service providers may be located in other countries with adequate data protection standards.

Primary Data Storage

- Kenya (primary location)
- EU-based cloud providers
- ISO 27001 certified facilities
- Encrypted data transmission

Transfer Safeguards

- Adequate data protection standards
- Contractual data protection clauses
- Regular compliance monitoring
- Data subject rights preservation

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This document is effective as of January 1, 2022 and was last updated on September 1, 2026.

At Endeleo Counselling Therapy, protecting your privacy is not just a legal requirement—it's fundamental to the trust and therapeutic relationship we build with you. We are committed to maintaining the highest standards of confidentiality and data protection.