MICHAEL CONTI

Therapist, clinical supervisor and trainer

PRIVACY POLICY

Effective: November 2026

1. About this policy

Reaching out to a therapist often means sharing things that are personal and sometimes painful. Looking after that information carefully is part of looking after you. This policy explains what personal information I collect, why I collect it, where it is kept, who else is involved in handling it, how long I keep it and what rights you have.

It applies to everyone who visits michaelconti.net, gets in touch with me, books a call, or works with me in therapy or supervision. It is written under the EU General Data Protection Regulation (GDPR) and Spanish data protection law (Ley Orgánica 3/2018, LOPDGDD).

2. Who is responsible for your information

Data controller	Michael Conti
Address	Avinguda de la Generalitat 29, 2-1, 08922 Santa Coloma de Gramenet, Spain
Tax ID (NIF)	Z1228368N
Email	info@michaelconti.net
Professional licence	Licensed psychotherapist and clinical supervisor, Malta Psychotherapy Professions Board

I work on my own, so I am the only person who reads your messages and therapy records. As a one-person practice I am not required to appoint a Data Protection Officer. For anything about your data, please write to info@michaelconti.net.

3. The short version

- I collect only what I need to reply to you, arrange sessions, work with you and meet my legal duties.
- Therapy notes never carry your name. Each client file has a code, and the key linking codes to names is kept separately in an encrypted, password-protected place.
- Everything that identifies you as a client is kept in Proton, an encrypted Swiss service, with a small number of exceptions described below (calendar, contacts, video sessions, invoicing and messaging).
- Emails are deleted once they have served their purpose. Therapy records and agreements are kept for five years after our last session, then deleted.

- What you tell me is confidential. The rare exceptions, such as a serious risk to someone's life, are explained in section 6.
- I never sell your data, and the website shows no advertising.

4. What I collect and why

4.1 When you visit the website

The website is hosted by Namecheap. Like any website, the server briefly processes technical information such as your IP address and browser type so the pages can reach you and the site stays secure.

A cookie banner (CookieYes) lets you choose which cookies you accept. Cookies needed for the site to work are always on. Everything else stays off until you agree:

- **Statistics**: Google Analytics, connected through Google Site Kit, tells me how many people visit and which pages they read. It only runs if you accept statistics cookies.

Some pages also load content from Google: fonts used to display the text, and YouTube for my introduction video. When these load, your browser connects to Google's servers, which receive technical information such as your IP address.

Forms on the site are protected by hCaptcha, which checks that a real person is filling them in. hCaptcha only appears on pages with a form, and it processes information such as your IP address and how you interact with the page.

4.2 When you send me a message

If you use the contact form, I receive your name, email address, phone number, the topic you tick and anything you write in the message box. The form doesn't store your message on the website. It is sent straight to my encrypted Proton mailbox. You can also write to me directly at info@michaelconti.net.

I ask you not to include details about your health in a first message, but I know that people often mention what is bringing them to therapy, and you are welcome to say as much or as little as feels right. Because this can include information about your mental health, the form asks for your explicit consent before it is sent. I use what you write only to reply to you, and I delete the message once your enquiry has been dealt with.

4.3 When you book a free initial call

Initial calls are booked through TidyCal, a scheduling service run by Sumo Group Inc. in the United States. When you book, TidyCal collects your name, email address and phone number, and whether you would like to hear about other activities such as workshops and events. The booking page asks for your consent before you confirm.

TidyCal sends me an email confirmation. I delete these emails once the call has taken place. TidyCal itself keeps a record of the booking in my account, and its system doesn't let me delete individual bookings. You can ask TidyCal directly to erase your data at tidycal.com/gdpr, and I'm happy to help you with this if you would like. The booking calendar is embedded on the site. Because it is embedded, TidyCal's page may load resources from other companies.

The initial call takes place on the same video platform as sessions (see 4.5). I don't record calls or sessions.

4.4 If you become a client or supervisee

When we agree to work together, you sign a therapy or supervision agreement (a PDF). I then keep:

- **Contact details**: your name, email address and phone number, stored in my Proton contacts and my Google contacts.
- **An emergency contact**: the name and phone number of someone you choose, stored with your contact details in Google contacts. I would only contact them in an emergency, as agreed with you in our working

agreement. Please let this person know you have given me their details. Section 12 explains what this means for them.

- **A client register**: your address, date of birth, the code that links you to your notes and whether our work is ongoing, paused or ended. This is a password-protected spreadsheet in my encrypted Proton Drive.
- **Session notes**: brief notes about our work, including what brought you to therapy. These are health data. Notes are kept in a separate notes app (Joplin) under a code rather than your name, and are end-to-end encrypted. The encrypted backup is stored on Dropbox, which can only see scrambled data, never the content. Neither Joplin nor this Dropbox account is used for anything else.
- **Reports and letters**: if you ask me to write a report or letter, it is kept in Proton Drive and only sent to the person or organisation you ask me to send it to.
- **Appointments**: sessions are in my Google Calendar using only your first name and email address, so I can send you the invitation from my Gmail account.
- **Emails**: emails about specific appointments are deleted once that appointment has passed. Any remaining emails are deleted when our work together ends.

If you're a supervisee, the same applies. When you bring client work to supervision, please present it without identifying details. My supervision notes contain only that anonymised material.

If we haven't been in touch for two months and you haven't let me know you want to pause, I close your file as ended. From that point the retention periods in section 9 apply.

4.5 Online sessions

Sessions currently take place on Google Meet. Google encrypts the video and audio while it travels, and I join from a private space where no one else can hear. Google processes technical data such as your IP address and device details to make the call work. Sessions are never recorded.

4.6 Messages about cancellations or running late

If you need to cancel at short notice or let me know you are running late, you can message me on Signal (my preference, as it is end-to-end encrypted and collects very little data) or WhatsApp. I use these apps only for practical arrangements, so please bring anything personal to our sessions rather than writing it in a message. Messages are set to disappear automatically after four weeks.

WhatsApp messages are also end-to-end encrypted, but WhatsApp (Meta) collects more information about how the app is used, so I would encourage you to use Signal if you can.

4.7 Fees and invoices

I issue invoices through Zoho Invoice. An invoice shows your name, the dates and fees of sessions and any details the law requires. Payments arrive by bank transfer to my bank account, which therefore sees your name and bank details as the sender. Invoices are shared with my accountant and with the Spanish tax authority (Agencia Tributaria), because the law requires it.

4.8 Newsletter

If you ticked the box asking to hear about other activities, I add your name and email address to my mailing list on MailerLite (MailerLite, based in Lithuania, EU). I send an occasional newsletter about events, workshops and similar activities. Every newsletter has an unsubscribe link, and you can also simply ask me to remove you. Being on the list doesn't tell anyone whether you are or were a client.

4.9 My own supervision

Like all therapists, I discuss my work with a clinical supervisor of my own. This is part of good practice and helps me work well with you. I always do this anonymously, without your name or details that could identify you, and no records about you are kept as part of it.

5. The legal basis for using your information

What I do	Legal basis
Replying to your message or booking request	Taking steps at your request before an agreement (GDPR Art. 6(1)(b)). For anything you share about your health: your explicit consent (Art. 9(2)(a)), which you can withdraw at any time.
Therapy and supervision, including notes, register, reports and appointments	Our agreement (Art. 6(1)(b)). Health information is processed for the provision of health care by a professional bound by confidentiality (Art. 9(2)(h) and 9(3), with Art. 9 LOPDGDD and Spanish law on clinical records, Ley 41/2002).
Keeping your emergency contact	My legitimate interest, and yours, in being able to act if you are in danger (Art. 6(1)(f)). In a real emergency: protecting someone's vital interests (Art. 6(1)(d) and 9(2)(c)).
Invoices, payment and tax records	Legal obligations under Spanish tax and commercial law (Art. 6(1)(c)).
Newsletter	Your consent (Art. 6(1)(a) and Spanish law on electronic communications, LSSI). You can withdraw at any time.
Statistics cookies	Your consent through the cookie banner (Art. 6(1)(a) and Art. 22.2 LSSI).
Essential cookies, hosting, form spam protection (hCaptcha)	My legitimate interest in running a secure, working website (Art. 6(1)(f)).
Keeping records for possible complaints or legal claims	My legitimate interest in being able to respond (Art. 6(1)(f)), and for health data, the establishment or defence of legal claims (Art. 9(2)(f)).

6. Confidentiality and its limits

What you share with me stays between us. I follow the code of ethics of the Malta Psychotherapy Professions Board, and I don't share information about you without your agreement.

There are a few situations where I may have to pass information on without your consent. These are rare, and wherever it is safe and possible I would talk with you first:

- if I believe there is a serious risk to your life or safety, or to someone else's;
- if I learn that a child or vulnerable adult is being harmed or is at serious risk;
- if the law requires it, for example information about terrorism or certain serious crimes;
- if a court orders me to disclose information.

In these situations I share only what is necessary, and only with the people who need it, such as emergency services or the relevant authority.

7. Who else handles your information

I use a small number of services to run my practice. Where they handle data on my behalf, they may only use it to provide their service to me.

Google also provides the video platform for sessions.

Service	Location	What it is used for
Proton AG	Switzerland	Encrypted email (info@), contacts, Drive storage, sending form emails

Service	Location	What it is used for
Google	Ireland / USA	Gmail invitations, contacts including emergency contacts, calendar, Analytics (with consent)
Joplin with Dropbox	USA (Dropbox)	End-to-end encrypted backup of coded session notes; Dropbox cannot read the content
Sumo Group Inc. (TidyCal)	USA	Booking initial calls
Namecheap, Inc.	USA company, EU servers	Website hosting
Intuition Machines, Inc. (hCaptcha)	USA	Spam protection on forms
CookieYes Limited	United Kingdom	Cookie banner and consent records
MailerLite (UAB MailerLite)	Lithuania (EU)	Newsletter, only if you opt in
Zoho (Zoho Invoice)	EU data centre	Invoicing
Signal Messenger LLC / WhatsApp (Meta)	USA / Ireland	Practical messages about cancellations or lateness

Other organisations receive information because they have their own legal role: my bank, my accountant and the Spanish tax authority. Reports and letters go only to the people you ask me to send them to.

8. Information leaving the European Union

Some of these services are based outside the EU. Switzerland and the United Kingdom are recognised by the European Commission as giving an adequate level of protection. For companies in the United States, transfers rely on the EU-US Data Privacy Framework where the company is certified, or on the European Commission's Standard Contractual Clauses.

To keep this to a minimum, the most sensitive information, your session notes, is end-to-end encrypted before it leaves my device, and the key linking notes to names stays in Proton in Switzerland.

9. How long I keep your information

Information	How long
Contact form messages and enquiry emails	Deleted once your enquiry has been dealt with
TidyCal confirmation emails	Deleted after the initial call
TidyCal booking record	Kept by TidyCal while my account is active – you can ask for erasure at tidycal.com/gdpr
Emails about appointments	Deleted once the appointment has passed
All other emails with clients and supervisees	Deleted when our work together ends
Calendar entries	Kept by Google Calender while my account is active – you can ask me directly for erasure

Information	How long
Signal or WhatsApp messages	Disappear automatically after four weeks
Signed agreement, client register, contact details, emergency contact, session notes and reports	Five years after our last session, or longer if a complaint or legal claim is ongoing. I check and delete records every three months, so deletion happens within three months of the five-year point
Invoices and payment records	Seven years, to meet Spanish tax and commercial law
Newsletter subscription	Until you unsubscribe or ask me to remove you
Website statistics	18 months in Google Analytics
Cookie consent record	As set by CookieYes

Five years after the end of therapy is in line with the minimum period for clinical records under Spanish law (Ley 41/2002, Art. 17).

10. How I protect your information

- Client records are kept in Proton, which encrypts data so that Proton itself cannot read it.
- Session notes are coded rather than named, end-to-end encrypted, and kept separate from the key that links codes to names.
- The client register is password-protected, and accounts I use for the practice are protected with two-factor authentication.
- My devices are password-protected and I work from a private space.
- My calendar holds only your name and email address.
- If something ever went wrong, such as a lost device or an account breach, I would assess the risk straight away, report it to the Spanish data protection authority within 72 hours where the law requires it, and tell you directly if it could affect you.

11. Your rights

You have the right to:

- ask for a copy of the information I hold about you;
- ask me to correct anything inaccurate;
- ask me to delete your information, or to limit how I use it;
- object to how I use your information where I rely on legitimate interest;
- receive information you gave me in a portable format;
- withdraw your consent at any time, for example to the newsletter or cookies, without this affecting anything done before.

Some of these rights have limits. For example, while the five-year period for therapy records is running, I may need to keep them to meet my professional and legal duties, even if you ask me to delete them. If that happens I will explain why.

To use any of these rights, write to info@michaelconti.net. I will reply within one month. There is no charge.

12. If you are someone's emergency contact

If a client has named you as their emergency contact, I hold your name and phone number with their contact details. I will only use them to contact you in an emergency involving that client, and I delete them when I delete the client's records. You can contact me at info@michaelconti.net if you have questions about this.

13. Cookies

You can change your cookie choices at any time by clicking the cookie icon at the bottom of each page. The cookie banner lists each cookie, what it does and how long it lasts.

14. Changes to this policy

I review this policy at least once a year and whenever the way I work changes, such as switching to a different video platform. The date at the top shows when it was last updated. If a change affects current clients in a meaningful way, I will let you know directly.

15. Questions and complaints

If you have any questions or concerns, please write to me first at info@michaelconti.net. I would like the chance to put things right. You also have the right to complain to the Spanish data protection authority: Agencia Española de Protección de Datos (AEPD), C/ Jorge Juan 6, 28001 Madrid, Spain – www.aepd.es