



## Privacy Policy

In accordance with the Protection of Personal Information Act 4 of 2013 (POPIA).

Last updated: March 2026

This Privacy Policy explains how Illuminate Counselling, operated by Micaelan Finnley Halse ("we", "us", "our"), collects, uses, stores, and protects your personal information. We are committed to protecting your privacy and to handling your personal information responsibly, lawfully, and transparently in accordance with POPIA. Please read this policy carefully. By using our website or engaging our services, you acknowledge that you have read and understood this policy.

### A — Who We Are

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Responsible Party: Micaelan Finnley Halse

Practice Name: Illuminate Counselling

Registration: ASCHP-SWC26/10267

Physical Address: Wynberg, 7800, Cape Town, Western Cape, South Africa

Email: [mick@illuminate-counselling.co.za](mailto:mick@illuminate-counselling.co.za)

Telephone: +27 79 868 8864

Website: <https://illuminate-counselling.co.za>

### B — What Personal Information We Collect

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As a counselling practice, we collect two categories of personal information:

#### B1 — GENERAL PERSONAL INFORMATION

This includes:

- Full name
- Contact details (email address, telephone number)
- Date of birth
- Emergency contact details
- Billing and payment information
- Session notes and correspondence

#### B2 — SPECIAL PERSONAL INFORMATION (HEALTH / WELLNESS DATA)

By its nature, counselling involves the collection and processing of special personal information as defined under Section 26 of POPIA. This includes information relating to your mental and physical health, psychological history, and other sensitive personal matters disclosed in the course of counselling. This information is treated



with the highest level of confidentiality and is processed only as permitted under Section 32 of POPIA, which provides an exemption for health and wellness professionals.

## **C – How We Collect Your Information**

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We collect personal information directly from you through:

- Initial enquiry forms and email correspondence
- Intake and consent forms completed before or at the start of counselling
- Information shared during counselling sessions
- Invoicing and payment processes
- Our website (see Section 7 on cookies and log files)

## **D – Why We Collect and Use Your Information**

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We collect and process your personal information for the following purposes:

- To provide counselling and related support services to you
- To maintain accurate and confidential records of your care
- To contact you regarding appointments, invoices, and administrative matters
- To comply with our legal and professional obligations
- To protect your vital interests or those of a third party where required by law

We will not use your personal information for any purpose other than those stated above without your explicit consent.

## **E – Confidentiality**

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Everything you share in counselling is strictly confidential. We will not disclose your personal or health information to any third party without your written consent, except in the following legally mandated circumstances:

- Where there is a serious and imminent risk of harm to yourself or another person
- Where we are required to report by law, including mandatory reporting obligations under the Children's Act 38 of 2005 in cases of suspected child abuse or neglect
- Where disclosure is ordered by a court of law
- Where disclosure is necessary to prevent or investigate the commission of a serious offence



Where possible and safe to do so, we will discuss any proposed disclosure with you before it occurs.

## F – Minor Clients

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Where counselling is provided to a person under the age of 18, the following applies:

- Consent for counselling must be provided by a parent or legal guardian, unless the minor has the legal capacity to consent independently in terms of applicable law
- The personal and health information of minor clients is treated with the same confidentiality as adult clients
- Parents or guardians will be kept informed of the general progress of counselling where appropriate, but the specific content of sessions will remain confidential unless disclosure is required by law or there is a risk of harm
- We may work with minors and their families together, including in the family home or another chosen safe space. In such cases, the privacy of all individuals involved will be respected

## G – Website, Cookies and Log Files

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### G1 – INFORMATION COLLECTED VIA OUR WEBSITE

When you visit our website, we may automatically collect certain information including your IP address, browser type, pages visited, and the date and duration of your visit. This information is aggregated and anonymous and is used only to improve the website experience.

### G2 – COOKIES

Our website may use session cookies (which expire when you close your browser) and permanent cookies (which are stored on your device). Cookies are used to improve your browsing experience. You may disable cookies in your browser settings, though this may affect certain website functionality.

### G3 – THIRD-PARTY LINKS

Our website may contain links to third-party services, including our online booking platform. We are not responsible for the privacy practices of third-party websites and encourage you to review their privacy policies independently.

## H – Online Counselling and Cross-Border Data

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### H1 – SCOPE

We offer counselling services online to clients internationally. Where your personal information is transferred or processed outside of South Africa, we take reasonable steps to ensure that it receives an equivalent level of protection in accordance with Chapter 9 of POPIA. Online sessions are conducted via secure video conferencing platforms. We recommend that you access sessions from a private location to protect your own confidentiality.



## **H2 — CLIENTS IN THE EUROPEAN UNION**

For clients located in the EU, GDPR also applies to the processing of personal information. Your data is processed on the lawful bases of contract performance (Article 6(1)(b)) and, for health data, provision of healthcare by a professional bound by professional secrecy (Article 9(2)(h)). Cross-border transfers to South Africa are covered by Standard Contractual Clauses. You have additional rights under GDPR including data portability and the right to erasure.