

Privacy notice & consent

Online psychosocial counselling | Personal information and health-related data

1. Who is responsible?

Stefan Kohlweg, trading as Clusterkopfschmerz Beratung, Stenografengasse 4, 1230 Vienna, Austria.
Contact for privacy questions and requests: kohlweg@clusterberatung.at.

2. What information is used, and why?

Contact and billing details, appointments, package balances and correspondence are used to arrange and administer counselling. Information you choose to share about your health, emotional wellbeing, relationships or other sensitive matters is used to provide personalised counselling and keep proportionate notes for continuity. Only information needed for these purposes should be collected.

Legal bases: Article 6(1)(b) GDPR for ordinary information necessary for the counselling agreement; Article 6(1)(c) for legally required accounting records; explicit consent under Articles 6(1)(a) and 9(2)(a) for sensitive information as described here. Counselling consent is separate from acceptance of the service terms.

3. Your video platform: VDO.Ninja

Sessions are planned on VDO.Ninja using a password-protected peer-to-peer room. Audio and video are encrypted between the participants. If direct connectivity fails, an encrypted TURN relay may be used. Direct connections can disclose each participant's IP address to the other.

VDO.Ninja uses signalling, network-discovery and security infrastructure to establish and protect connections. VDO.Ninja and its providers, including Cloudflare, may process IP addresses, browser/device details, timestamps and other operational metadata. Infrastructure may operate outside the European Economic Area, including in the United States. Cloudflare maintains logs under its own policy.

Our planned links disable VDO.Ninja quality analytics and embedded website loading, and place the room name and password in the URL fragment. VDO.Ninja states that it does not store call content after a session. No recording, transcription, Meshcast or cloud-upload feature will be enabled by the provider. Participants agree not to record without a separate express agreement. A participant can nevertheless use external recording software.

Platform details: [VDO.Ninja privacy policy](#). Its operational processing is also governed by that policy. Changing the platform requires advance information to you.

Your information & choices

Please read the notice before giving consent

4. Recipients and confidentiality

Access to counselling information is limited to the provider and any authorised service provider whose access is necessary and lawfully arranged. Accounting advisers and payment providers may receive billing information as needed. N26 receives payment data; if you choose Wise, Wise processes your transfer under its own terms. Diagnoses and counselling details should not appear in the payment reference. Disclosures required by law or necessary for legal claims are limited to what is necessary.

5. Retention and withdrawing consent

Proportionate counselling notes are normally retained for up to three years after counselling ends, then deleted. Accounting records are kept for the applicable statutory period, normally seven years, and longer if a legal duty requires it.

You may withdraw sensitive-data consent at any time by emailing kohlweg@clusterberatung.at. Processing based on consent then stops; withdrawal does not affect earlier lawful processing. Information is deleted unless an independent legal basis permits or requires necessary retention. Any retained information for legal obligations or legal claims is limited and access restricted. Withdrawal may mean that counselling requiring sensitive information cannot continue; unused package credit is handled under the service terms.

6. Your rights

Subject to GDPR conditions, you may request access, correction, deletion, restriction and portability, and object where processing relies on legitimate interests. You may complain to the Austrian Data Protection Authority: www.dsb.gv.at. Providing billing/contact information is needed for the agreement. You decide what sensitive information to share. No automated decision-making or profiling is planned.

Your explicit consent

Please complete and return all three pages of this privacy notice

Full legal name

Email address

☐

I explicitly consent to Stefan Kohlweg processing health-related and other sensitive information I choose to share, solely to provide and document my counselling and support its continuity, as explained in this notice. I understand that I may withdraw this consent at any time.

Signature / typed name confirming explicit consent

Date

The checkbox starts unchecked. A completed form must be returned to the provider; entering text alone does not send it. No marketing consent is requested.