**YOUR PERSONAL INFORMATION - GENERAL DATA PROTECTION REGULATION (GDPR)**

**Who I am and how to contact me:**

Annette Brown

Heart in Hands Holistics

Annette Brown
07507823114
Email:
7 Grangewood Road, NG17 8PG

**Data Controller Contact Details**: Annette Brown

**The Purpose of processing Client Data**

To give professional treatments, I need to gather and retain potentially sensitive information about your health. I will only use this information for informing the treatments I offer, and associated recommendations concerning aspects of health and wellbeing which I will offer to you. I take basic contact details and information via my website to allow me to contact you and handle bookings.

**Lawful Basis for holding and using Client Information**

As a member of the Association of Reflexologists (AoR) I abide by Code of Practice and Ethics for this organisation. The lawful basis under which I hold and use your information is my legitimate interests i.e.my requirement to retain the information to provide you with the best possible treatment options and advice, and to provide you with training and follow up documentation.

As I hold special category data (i.e., health related information), the **Additional Condition** under which I hold and use this information is for me to fulfil my role as a health care practitioner bound under the AoR Confidentiality as defined in their Code of Practice and Ethics.

**What information I hold and what I do with it**

To give professional treatments, I will need to ask for and keep information about your health. I will only use this for informing the treatments I offer, and any advice I give because of your treatment. The information held is:

* Your contact details
* Medical history and other health-related information (which I will take from you at first consultation)
* Treatment details and related notes (which I will take each consultation / treatment)

I will not share your information with anyone else, (other than as required for legal process), except for (and in relation treatments specifically) the following circumstances:

* If I do need to share your information for any other reason, then I will explain why it is necessary and will get your explicit consent before sharing that information.

**How Long I Retain Your Information for**

I will keep your information for the following periods:

* claims occurring insurance: for which I am required to keep my records for 7 years after the last treatment
* law regarding children’s records: for which I am required to keep my records until the child is 25, or if 17 when treated then until they are 26.

I will not transfer your data outside the EU without your consent, although you need to be aware that I do use third party services as part of my business operations, these are:

* Electronic Payments: I use SumUp which holds all of its Merchant Data in the European Union. Full details of its privacy policy can be found here: https://help.sumup.com/hc/en-gb/articles/360004703114-GDPR-SumUp-and-Your-Data
* Website: My website is provided through PhD Interactive and their WebHealer solution. They do not hold any personal data on my behalf, and while any emails received via my website are done so via the WebHealer mail system for privacy reasons they are not accessible to staff at WebHealer and are not stored on any of their systems. The full privacy statement from PhD Interactive can be found here: http://www.phdinteractive.co.uk/privacy/
* Newsletter: If I send you a newsletter this is done via MailChimp. Their GDPR policy can be found here: https://mailchimp.com/gdpr/

**Protecting Your Personal Data**

I am committed to ensuring that your personal data is secure. To prevent unauthorised access or disclosure, I have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information I collect from you. I will contact you using the contact preferences you give me in your first contact with me, and during our consultations, in relation to:

* Appointment times
* Complementary Therapy and / or natural health information or information related to your health
* News, special offers and promotions *(you may unsubscribe from this at any-time)*

**Your Rights**

GDPR gives you the following rights:

* The right to be informed: *To know how your information will be held and used (this notice).*
* The right of access: *To see your therapist’s records of your personal information, so you know what is held about you and can verify it.*
* The right to rectification: *To tell your therapist to make changes to your personal information if it is incorrect or incomplete.*
* The right to erasure (also called “the right to be forgotten”): *For you to request your therapist to erase any information they hold about you*
* The right to restrict processing of personal data: *You have the right to request limits on how your therapist uses your personal information*
* The right to data portability: You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
* The right to object: *To be able to tell your therapist you don’t want them to use certain parts of your information, or only to use it for certain purposes.*
* Rights in relation to automated decision-making and profiling.
* The right to lodge a complaint with the Information Commissioner’s Office: *To be able to complain to the ICO if you feel your details are not correct, if they are not being used in a way that you have given permission for, or if they are being stored when they don’t have to be.*

You are not required to pay any charge for exercising your rights. If you make a

request, we have one month to respond to you.

Please contact us at [insert email address, phone number and or postal

address] if you wish to make a request.

**Therapists Rights**

Please note:

* If you don’t agree to me keeping records of information about you and your treatments, or if you don’t allow me to use the information in the way I need to for treatments, I may not be able to treat you.
* I must keep your records of treatment for a certain period as described above, which may mean even if you ask me to erase any details about you, I might have to keep these details until after that period has passed.
* I can move your records between computers and IT systems, as long as your details are protected from being seen by others without your permission.

**How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [Insert your contact details].

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address:

Information Commissioner’s Office

Wycliffe House

Water Lane, Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

**DECLARATION**

I have seen this document and understand that you will hold and use my personal information as outlined above, using it to provide me with the best possible treatment options, and advice in line with the statements above. I have received a copy of this document.

Name (PRINT):................................................................................................................. Date:..................................

Signature: ...............................................................................................................

Note: for children under 16 a parental or guardian signature is required.