

# Cathy Masser Reflexology Privacy Policy

## **The type of personal information I collect**

In order to give professional reflexology treatments, I will need to ask for and keep information about your health. I will only use this for informing reflexology treatments and any advice I give as a result of your treatment. The information held is your contact details, medical history and other health-related information, treatment details and related notes.

## **How I get the personal information and why I hold it**

Most of the personal information I process is provided to me directly by you for informing reflexology treatments and any advice I give as a result of your treatment. I use the information that you have given in order to provide you with the best possible treatment options, support and advice. I may share this information with relevant professionals subject to your consent.

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

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis I rely on for processing this information are: (a) Your consent. You are able to remove your consent at any time. You can do this by contacting me at the above address. (b) I have a contractual obligation (c) I have a legal obligation: 1.1. 'Claims occurring' insurance: (records to be kept for 7 years after last treatment) 1.2. Law regarding children's records (records to be kept until the child is 25 or if 17 when treated, then 26) 1.3. CNHC requirements to retain information for 8 years (d) I have a vital interest (e) I need it to perform a public task (f) I have a legitimate interest [i.e. in order to provide you with the best possible treatment options and advice]. 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 the AoR Code of Practice and Ethics.

## **How I store your personal information: Protecting your Personal Data**

I am committed to ensuring that your personal data is secure. In order 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 have given me.

I keep your contact details, consent form and consultation notes for seven years. I will then dispose of your information by shredding it.

## **Your data protection rights**

Under data protection law, you have rights including: Your right of access - to ask me for copies of your personal information. Your right to rectification - to ask me to rectify personal information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete. Your right to erasure - to ask me to erase your personal information in certain circumstances. Your right to restriction of processing - to ask me to restrict the processing of your personal information in certain circumstances. Your right to object to processing - to object to the processing of your personal information in certain circumstances. Your right to data portability - right to ask that I transfer the personal information you gave me to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you.

## **THERAPIST'S RIGHTS**

1. 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.
2. I have to keep your records of treatment for a certain period as described above, which may mean that even if you ask me to erase any details about you, I might have to keep these details until after that period has passed
3. I can move your records between my 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 my use of your personal information, you can make a complaint to me at First Floor, Kite Studios, 2B Bassein Park Road, London W12 9RY. You can also complain to the ICO if you are unhappy with how I 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>