

PRIVACY POLICY

This document is TeignReflexology's official Privacy Policy, which applies to all personal information collected by Dawn Woodes. The document explains what personal information I hold, how and why personal information is collected, how it is used, and the controls that you have over its use. I hold and use client data in order to provide the client with the best possible treatment options, support and advice, complying with GDPR.

TeignReflexology is committed to complying with the General Data Protection Regulation (GDPR), governing how businesses control the way they collect and use personal information. The EU regulations come into force from 25th May 2018, designed to protect and safeguard individuals privacy when dealing with service providers.

TeignReflexology will never disclose your personal information to any third party unless specific permission is given.

Your Personal Information

1. Lawful basis for holding and using Personal Information.

As a full member of the Association of Reflexologists, I abide by the AoR Code of Practice and Ethics. The lawful basis under which I hold and use your information is:

Legitimate Interest: I am required to retain the information about my clients in order to provide them with the best possible treatment options and advice.

Special Category Data - Health Related: 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.

I am required to hold information for the following legal reasons:

- a) 'claims occurring' insurance. Insurance provider is Alan Boswell: records to be kept for 7 years after last treatment
- b) law regarding children's records: records to be kept until the child is 25, or if 17 when treated, then 26.
- c) to fulfil my role as a Health Care Practitioner and member of the AoR.

2. Data I process, where it comes from and how it is stored.

Data comes into my business through: Email, Text, Website, Facebook, Phone and face to face Consultations. All efforts are made to ensure information is kept safe and secure, with procedures in place to protect against loss, misuse, alteration or theft.

I process data through:

- Mac: in my home office/therapy room, encrypted and password protected
- Smart phone: appointments and non-identifiable contact information, password

protected

- Paper records: non-identifiable client notes, carried with me on mobile visits or locked in a cabinet in my office

3. Personal Information I hold, why I hold it and length of time I hold it

In order to give professional Reflexology, and other treatments, I need to ask for and keep information about clients and their health. I will ONLY use this information for informing those therapies and any advice I give as a result of treatment. This information includes:

- Name, address, DOB and contact details
- Medical history, health and wellbeing and other health-related information
- Treatment details and related notes for each treatment session

I will NOT share information with anyone else unless requested to do by explicit consent from the client. Referrals may be made to the client, who should take it upon themselves to arrange.

4. Protecting Personal Data

I am committed to ensuring that clients 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. Clients details and notes are recorded in a non-identifiable manner and electronic communication is generally not information sensitive. Passwords, Encryption and locks are used where appropriate.

5. Privacy and Consent Notice.

The right to be informed:

In complying with GDPR, TeignReflexology has a Privacy and Consent Notice outlining rights and responsibilities. Clients should sign a copy, acknowledging that they are happy with procedures in place to safeguard their information. This usually occurs during the first consultation with the client. A copy of the Privacy and Consent Notice may be sent via email or a link through a message or text in advance of the first session. The notice includes information outlined in the ICO checklist. It is also available to download from this link: [Privacy and Consent Notice](#)

6. Processes to recognise and respond to individuals' requests to access their personal data.

The right of access:

Clients have the right to access personal information held about them. Following a written request, via letter or email, TeignReflexology has one calendar month upon receipt to supply a copy. Further identification may be necessary before releasing information due to the special category under which I process data, ie verbal confirmation from the client.

A record of any requests to access personal data will be kept.

7. Processes to ensure that the personal data I hold remains accurate, complete and up to date.

The right to rectification:

I will ensure that client information is kept accurate and up to date following treatments and in between if appropriate, should I be informed of any changes by the client.

Regular reviews are undertaken to make sure Data held is in compliance with the regulations.

8. Schedule to dispose of various categories of data, and its secure disposal.

The right to erasure:

Once a year I will review my client files, placing dormant clients in a separate file, awaiting further contact or the obligatory 7 years, whichever comes first. This process will ensure that data no longer required to be kept under GDPR and insurance reasons can be destroyed securely. Clients can request that their files be destroyed but they would have to waiver their right to any insurance claim in the future. Information from prospective clients is destroyed if they should not become a client.

9. Procedures to respond to an individual's request to restrict the processing of their personal data.

The right to restrict processing of personal data:

Clients can request that minimal information is held about them but this may compromise treatment, may not be in their best interests and may have insurance ramifications. I may reserve the right to refuse treatment on this basis.

10. Processes to allow individuals to move, copy or transfer their personal data from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability:

I do not hold any treatment information electronically. Should clients wish their data to be copied or transferred I would work with the client to ensure that this is done in a way that was most appropriate for them - for example this could be an electronic summary of treatment received and progress made, copies of individual treatment records.

11. Procedures to handle an individual's objection to the processing of their personal data.

The right to object

I will inform my clients of their right to object about information being held about them "at

the point of first communication” and have clearly laid this out in my privacy notice.

12. Processing operations that constitute automated decision making.

Rights in relation to automated decision-making and profiling

I do not have any processing operations that constitute automated decision making and therefore, do not currently require procedures in place to deal with the requirements. This right is, however, included in my privacy statement.

13. Complaints and Data Breaches.

The right to lodge a complaint with the Information Commissioner’s Office:

You have the right to make a complaint if you feel your details are not correct, if they are not being used in a way that you have given consent for or they are being stored when they don't need to be. Your complaint should be directed in the first instance to e-mail: d.woodes@sky.com. Receipt of which will be acknowledged within 48 hours of receiving it.

The complaint will be investigated and an attempt to resolve any breach that might have occurred will take place in accordance with the General Data Protection Regulation (GDPR). If you are not satisfied with the outcome of this procedure, then you may request that an independent person (usually the Information Commissioner's Office) investigate your complaint.

Full details of your rights can be found at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

14. Effective and structured information risks management

The risks associated with my data, and how that risk is managed is as follows:

- Theft of electronic devices - password locks on all devices which are changed regularly and are not shared with anyone.
- Break in to office - all my paper files are stored in a locked filing cabinet in my office/therapy room, within my home. No one is left in the room alone.
- Loss or theft of paper file while mobile – I take minimal information with me on a mobile visit, and it remains with me at all times or in a locked car.

15. Named Data Protection Officer (DPO) and Management Responsibility

Although not required to have a named DPO, as the sole employee I am the DPO and will ensure that I remain compliant with GDPR.

16. Security Policy

As detailed in my risk assessment. I have also chosen my electronic equipment based on their industry record as having the most robust inbuilt protection possible.

17. Data Breach Policy

A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

I understand that I only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, I will notify those concerned directly and without undue delay.

In all cases I will maintain records of personal data breaches, whether or not they were notifiable to the ICO.

18. Data Protection Policy

This document forms my data protection policy and shows how I comply with GDPR.

This is a live document and will be amended as and when any changes to my data processing takes place, at the very least it will be reviewed annually.

As the only member of staff I believe that I have done an appropriate amount of research around the implications of the new GDPR, including taking heed of the advice and guidance provided by my professional membership organisation, the AoR.

19. Changes to Privacy Policy

If and when TeignReflexology changes its Privacy Policy, it will post changes on its Privacy Policy page on its website so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

20. Contacting me

If you require further information regarding TeignReflexology's Privacy Policy, please contact me at the following address: E-mail: d.woodes@sky.com

Should you wish to read more information on privacy legislation or the General Data Protection Regulation (GDPR) I recommend that you visit the Information Commissioner's Office at <https://ico.org.uk/>.

21. Acceptance

Clients who enter into service with TeignReflexology by making a booking and attending for Reflexology treatments will be requested to sign an abbreviated version of this Policy, Privacy and Consent Notice, to indicate their understanding and acceptance of its contents.