

Anything in blue you will need to change to your personal information - in the case of how you store your data, please note that NON of this may apply to you, in which case you can remove it!

Anything in black you should leave as it has been worded by the Association of Reflexologists who worked this document out in conjunction with the ICO. Please do not remove the copyright notice - I don't have any problems you copying what I wrote, but the bulk of the document was prepared by the AoR and this should be acknowledged.

- Please note that you must get each new client to SIGN the full document. You CANNOT just get them to tick a box on your consent form to say they have read it and you CANNOT just give them a laminate copy of the form to read and then a one-sided piece of paper to sign that they have read it. You must have a copy of the full document signed by them.
- You must offer each new client a copy of your GDPR to take home - they don't have to take it, but you do need to offer!
- Registration with the ICO for GDPR costs £35 per year and can be done via the ICO website. Whether or not you do this is personal preference - I've always believed I should even when everything I had was just paper based, but others have different opinions. The final choice is yours. However, even if you do not register with the ICO you are still bound by the GDPR.

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

The GDPR brings new legal protection for personal information from May 2018. This tells you what personal information I hold and why, and what your rights are. Once you have read it please complete and sign the declaration at the bottom.

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

Sarah Woodhouse

07715213392

[sarah@sarahwoodhousetherapy.co.uk](mailto:sarah@sarahwoodhousetherapy.co.uk)

First floor, The Co-operative Building, The Street, Woolpit, Bury St Edmunds, Suffolk, IP30 9SA

### **Data Controller Contact Details:**

Sarah Woodhouse

### **The Purpose of processing Client Data**

In order to give professional treatments, I will 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 Federation of Holistic Therapists \(FHT\), the College of Bowen Studies \(CBS\), and a registered provider with the Complementary and Natural Healthcare Council \(CNHC\), and I abide by Code of Practice and Ethics for these organisations.](#) The lawful basis under which I hold and use your information is my legitimate interests i.e. my requirement to retain the information 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 FHT, CBS and CNHC confidentiality as defined in their Code of Practice and Ethics.](#)

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

In order 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 as a result of your treatment. The information to be 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 after each consultation)

I will NOT share your information with anyone else (other than as required for legal process) without explaining why it is necessary, and getting your explicit consent. **NOTE: If you do share their details with anyone else then you need to state this clearly.**

### 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.
- registration with The Complementary and Natural Health Care Council: for which I am required to retain information for **8 years** after the last treatment.

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:**

Email: I use Gmail by Google, which is based outside of the UK. They have committed to complying with all applicable privacy laws, and details of their commitment can be found here: <https://policies.google.com/privacy>.

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/>

Client Record Management: I use a cloud based client record management system provided by Reflexology Software.co.uk, which is designed and built by Tidal Wave, a UK company. This software is GDPR compliant and Tidal Wave are registered with the Information Commissioner's Office.

### 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 we collect from you.

I will contact you using the contact preferences you give me in your first contact with me, and during our first consultation, in relation to:

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

### 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: *under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.*
- 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.*

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/>

If you wish to exercise any of these rights, please use the contact details given above.

If you are dissatisfied with the response you can complain to the Information Commissioner's Office; their contact details are at: [www.ico.org.uk](http://www.ico.org.uk)

## **THERAPIST'S RIGHTS**

Please note:

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

## **DECLARATION**

I have seen this document and understand that you will hold and use my personal information, using it in order 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:

Date:

Signature: .....

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