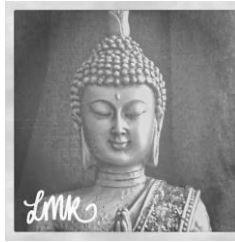




## Complementary Therapist



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### GDPR: Data Protection Policy

#### Policy Purpose

This policy outlines my data protection policy, and thus how I comply with the GDPR.

#### GDPR Registration

I have registered with the ICO and this is renewed automatically each year.

#### Policy Content

##### 1. The data that I process and how it flows into, through and out of my business.

Data comes into my business in 5 ways:

- a. Via email messages to me from potential clients and clients that have my email address.
- b. Via text messages to my mobile phone.
- c. Via my website [web provider: Ionos.com]
- d. Via my online booking platform [Fresha.com]
- e. Via Facebook Messenger and other social networking platforms.

It flows through my business via:

- My laptop - which I use at my work/home premises [password protected]
- My smart phone - everywhere I go [password protected]
- My paper file – which is at my work/home premises [lockable file]

The information does not flow out of my business.

##### 2. The personal data I hold, where it came from, who I share it with and what I do with it.

Information Asset Register

- I hold personal information about my clients that they have given me.
- This includes name, address, contact details, and, where appropriate, age. I also hold health and wellbeing information about them which I collect from them at their first consultation.
- I hold information about each treatment that they receive from me.
- I don't share this information with anyone. However, please note, in line with Safeguarding protocols; in the event that there is an indication that a child or vulnerable adult may be at risk of harm, it is an obligation to report concerns to the necessary agencies.
- I use the information I have to inform my treatments and provide them with any appropriate advice within the realms of the treatment, my professional experience and qualifications.
- I keep all data for:
  - a. claims occurring insurance: for which I am required to keep my records for 8 years after the last treatment
  - b. 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.
  - c. registration with The Complementary and Natural Health Care Council (for my work as a Reflexologist): for which I am required to retain information for 8 years.

##### 3. The lawful bases for me to process personal data and special categories of data.

I process the personal data under:

- **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:** I process under special category data, therefore the additional condition under which I hold and use this information is for me to fulfil my role as a complementary therapy practitioner, bound under the CHNC and the FHT Confidentiality as defined in their Codes of Practice.

#### **4. Privacy Notice**

Individuals need to know that their data is collected, why it is processed and who it is shared with. This information is included in my privacy notice on my website and within any forms or letters I send to individuals, including at my first consultation with my client.

I have written a privacy notice for my website and for my clients, and have ensured that the privacy notice includes all of the information included in the ICO privacy notice checklist at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed#table>

#### **5. Processes to recognise and respond to individuals' requests to access their personal data.**

All individuals will need to submit a written request to access their personal data - either by email or by letter. I will provide that information without delay and at least within one calendar month of receipt. I can extend this period by a further two months for complex or numerous requests (in which case the individual will be informed and given an explanation).

I will identify the client using reasonable means, which because of the special category under which I process data, will be photographic ID.

I will keep a record of any requests to access personal data.

#### **6. Processes to ensure that the personal data I hold remains accurate and up to date.**

I will ensure that client information is kept up to date during our treatments, and will update client information as I am informed of any changes.

Once a year I will also have a wholesale review of all data.

#### **7. Schedule to dispose of various categories of data, and its secure disposal.**

Once a year I will review my client information and will place dormant clients in a separate file. This will be assessed each month to ensure that data that is no longer required to be kept under GDPR is destroyed securely.

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

As I only hold data in order to provide treatments, I cannot envisage a situation where I would receive a request to restrict their processing of an individual's personal data. However, if I do receive a request I will respond as quickly as possible, and within one calendar month, explaining clearly what I currently do with their data and that I will continue to hold their data but will ensure that it is not processed.

#### **9. 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.**

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. I do not hold any treatment information electronically.

#### **10. Procedures to handle an individual's objection to the processing of their personal data.**

I will inform my clients of their right to object "at the point of first communication" and have clearly laid this out in my privacy notice.

#### **11. Processing operations that constitute automated decision making.**

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.

## **12. 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 organisations (CNHC for my work as a Reflexologist and FHT for my work as a Reflexologist and Reiki practitioner).

## **13. 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 - both have password locks on all electronic devices which are changed regularly and are not shared with anyone.
- Break in to office - all my paper files are stored in locked filing unit in my home. No one else has the key but me.
- Theft of paper file while at home - my home is fitted with a burglar alarm and CCTV.

## **14. 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.

## **15. 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.

## **16. 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.

## **17. Disposal of Data in the event of incapacity/death**

*In the event of an unforeseen circumstance such as my sudden death or an event leaving me incapacitated my next of kin is nominated to securely dispose/shred client data.*

**Data Protection Policy created: 10 May 2018;** This is a live document and will be updated as and when changes occur.

**Date of Last Review: November 2024** (due to changing website and booking system providers)

**Date of Next Review: as and when amendments are required.**

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