

YOUR PERSONAL INFORMATION - GENERAL DATA PROTECTION REGULATION (GDPR)

GDPR is bringing in new legal protection for personal information from May 2018. This tells you what personal information I gather via my website, and why, and what your rights are.

Organisation name: Pathways Reflexology
Address: Norwich, Norfolk
Data protection officer and data controller: Angela Sellens Drake
Contact: info@pathwaysreflexology.co.uk

The Purpose of processing the information I hold

- In order to give professional reflexology treatments, I will need to gather and retain potentially sensitive information about your health. I will only use this information for informing reflexology treatments and associated recommendations concerning aspects of health and wellbeing which I will offer to you.
- In order to deliver professional and CPD reflexology training, I hold and use data in order to provide you with the best possible learning experience, support and advice.
- 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 Information

As a Fellow member of the Association of Reflexologists (AoR), and as member of Professional Reflexology (PR) and as registrant of the Complementary and Natural Healthcare Council (CNHC), I abide by the Codes of Practice and Ethics of those organisations.

The lawful basis under which I hold and use information is my legitimate interest, and the requirement to retain the information in order to provide the best possible treatment for clients and the most appropriate training, follow-up support and advice for students.

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

What information I hold and what I do with it

In order to provide professional reflexology treatments, I will need to ask for and keep information about your health. I will only use this to inform reflexology treatments and any advice I give as a result of your treatment. The following information needs to be held:

- Your contact details.
- Your medical history and other health-related information (which I will take from you at your 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 within my own practice, or as required for legal process) without explaining why it is necessary, and obtaining your explicit consent.

In order to give professional learning opportunities and follow up support to students, I will need to ask for and keep the following information:

- Your contact details.
- Any health-related information that may affect your ability to study or complete a training course.
- Case studies you submit.
- Copies of certificates issued and records of your learning progress as a student.

On completion of an AoR approved CPD course, I need to share your contact details with AoR. AoR will keep your information for 6 months and will only contact you in regard to feedback. This is part of the criteria for AoR CPD training approval.

During and on completion of a training course that offers a qualification (such as the Reflexology Diploma Training course), information needs to be shared with:

- appointed course tutors.
- an internal verifier.
- an external verifier (normally someone appointed by the Awarding Body).
- the Awarding Body.

The reasons for sharing this information are:

- for quality verification purposes.
- in the circumstance that a complaint is raised.
- for legal process.
- on your request, to confirm that you have completed a course satisfactorily.

I will NOT share your information with anyone else (other than, as required, with those listed above) without explaining why it is necessary, and obtaining your explicit consent

How Long I Retain Your Information for

I will keep your information for the following periods:

- If you attend for treatments, I will keep your information for the period of 8 years from your last appointment, in accordance with the requirements of CNHC of which I am a registrant.
- In the case of a child, records need to be kept until the child is 25 (or 26, if they were 17 when treated).
- If you submit case studies as part of a training course, these will include health-related information. In this instance I will need to hold this information until I cease to offer training courses, as it may be required in the event of an insurance claim made in relation to your training.

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 give me in relation to:

- Appointment times.
- Reflexology information or information related to your health.
- Providing additional supporting material for a training course.
- Future training events, treatment information and promotions (you may unsubscribe from this at any time).

Your data will not be transferred outside the EU without your consent.

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 or tutor'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 or tutor 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 or tutor 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 or tutor 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 or tutor 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

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.

Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of my website features may not function as a result.

Other websites

My website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.