

PRIVACY NOTICE

This notice is to explain why I collect your personal data, and what I do with it, and to ensure I am working in accordance with the new EU General Data Protection Regulation (GDPR); terms from the regulation are indicated in bold.

When you supply your personal details to me, when we communicate by email, and when I take notes in the clinic, this information is stored and processed for four reasons in line with the GDPR requirements:

1. I need to collect personal information about your health in order to provide you with the best possible treatment. Your requesting treatment and our agreement to provide that care constitutes in law an (unwritten) **contract**.
2. I have a **legitimate interest** in collecting that information, because without it I couldn't practice acupuncture, kinesiology or naturopathic nutrition effectively and safely.
3. I keep records of your contact information because I think that it is important that I can contact you in order to confirm your appointments with me or to update you on matters related to your medical care. This again constitutes a **legitimate interest**, but this time it is your legitimate interest.
4. Provided I have your **consent** (and this only needs to be verbal consent), I may occasionally send you individualised health information by email in the form of articles or advice and recommendations we will have discussed in treatment. Occasionally I contact patients I have not seen for a while. I will not send out generalised leaflets or advertisements. You may withdraw this consent at any time – just let me know by any convenient method.

I have a **professional obligation** to retain your records for 8 years after your most recent appointment (or after you have reached age 25, if this is longer), but after this period you can ask me to delete your records if you wish. Otherwise, I will retain your records indefinitely in order that I can provide you with the best possible care should you wish to see me at some future date.

The following records are stored electronically:

- Your name, telephone number and email (if supplied)
- Clinical records of treatments provided and nutritional supplement recommendations
- Email correspondence between us
- Text correspondence between us
- Invoices if requested

These are all stored on secure password protected applications. Your clinical records each require a unique password to open them.

I am the only person who has access to your records, invoice files and emails. I will never share your information with anyone who does not have a legal right of access without your written consent.

You have the right to see what personal data of yours I hold, and you can also ask me to correct any factual errors. I am legally required to respond to any request from a client to see their personal data within a timescale of 30 days. However, I would ensure that I responded as soon as I possibly could to any reasonable request for access to personal records.

I want you to be absolutely confident that I am treating your personal data responsibly, and that I will do everything I can to make sure that the only people who can access that data have a genuine need to do so. In the case of my practice this would most likely apply in the situation of me needing to make a referral to another health professional in which case I would ask your permission to share clinical information.

Of course, if you feel that I am mishandling your personal data in some way, you have the right to complain. Please first raise your concern with me, as I hope very much I will be able deal with any

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concerns you might have. However, you can also raise a concern directly with the Information Commissioner's Office on <https://ico.org.uk/concerns/>