



Dulwich Reflexology Privacy Policy 2019 General Data Protection Regulations (GDPR)

Your personal information

GDPR was implemented in May 2018 and replaces the old Data Protection Act. This form tells you what personal information I hold and why, and what your rights are.

Data controller details

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The purpose for processing client data

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 well-being which I will offer to you. I take basic contact details and information to allow me to contact you and handle bookings.

Lawful basis for holding and using client information

As a full member of the Association of Reflexologists (AoR), I abide by the AoR Code of Practice and Ethics. The lawful basis under which I hold and use your information is my requirement to hold your information for the following reasons

- 'claims occurring' insurance
- law regarding children's records
- CNHC requirements to retain information

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

What information I hold and what I do with it

To give professional reflexology treatments, I will need to ask for and keep information about your health. I will only use this information for informing reflexology treatments and any advice I give you 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 the 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 required for legal process) without explaining why it is necessary and getting your explicit consent.

How long I retain your information

- For an adult I will hold these details for 7 years
- For a 17-year-old I will hold these details until they are 26 years old
- For children under 17, I will hold these details until they are 25 years old

Protecting your personal data

I am committed to ensuring that your personal data is secure. To prevent unauthorized access or disclosure, I have put in place technical, physical and managerial procedures to safeguard and secure your information.

I will contact you using the contact preferences you give me in relation to:

- Appointment times
- Reflexology information or information about your health
- Special offers and promotions (you may unsubscribe from this at any time)

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 record of your personal information so you know what is held and can verify
- **The right to rectification**
To ask for information to be corrected if necessary
- **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**

The right to tell your therapist you do not want them to use certain parts of your information, or only 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 (ICO)**

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 do not 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>

Therapist's rights

- If you don't agree to your therapist keeping records of information about you and your treatments, or if you don't allow the therapist to use the information in the way they need to for treatments, the therapist may not be able to treat you
- Your therapist must 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 may need to keep these details until that time has passed
- Your therapist can move their records between their computers and IT systems, if your details are protected from being seen by others without your permission