

PRIVACY POLICY Peaceful Steps Reflexology

This tells you what personal information I hold and why, and what your rights are.

Peaceful Steps Reflexology treats the privacy of its clients very seriously and takes appropriate security measures to safeguard privacy and to protect and manage any personal data provided by my clients.

How I obtain your personal data : You provide me with personal data from a health and medical questionnaire/consultation either online, written, email, telephone or face to face. This includes name, address, date of birth, email address, telephone numbers, gender, employment status, health and lifestyle status. Further personal data may be obtained before, during and after the treatment procedures

How I use your personal data: Your data will be used specifically to analyse, evaluate an individualised treatment plan best suited to the needs of the data subject consistent with a duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR)* I will also take reasonable security measures to protect your personal data in storage. *The Information Commissioner's Office (ICO) ico.org.uk may be contacted with any GDPR queries – see below.

The Purpose of Processing Client Data: I hold and use client data in order to provide you with the best possible treatment options, support and advice.

Lawful Basis for Holding and Using Client Information: The lawful basis under which I hold and use information is my legitimate interests i.e. my requirement to retain the information in order to provide you with the most appropriate 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 Association of Reflexologists (AoR) Confidentiality as defined in the AoR Code of Practice and Ethics.

The Information I Hold and What I Do With It: In order to give professional reflexology treatments, I will need to gather and keep potentially sensitive information about your health. I will only use this for informing reflexology treatments, 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
- Treatment details and related notes
- Reflective practice – my thoughts on how the treatments are progressing

I may contact you by email, phone or text in relation to:

- Appointment times
- Reflexology information or information related to your health

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 getting your explicit consent – see below.

I will keep your information for the following periods in line with the lawful basis listed: claims occurring insurance records to be kept for 7 years after last treatment and children's records to be kept until the child is 25 or if 17 when treated, then 26.

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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 have given me by clients.

Your Rights: GDPR gives you the following rights:

- The right to be informed: to know how your information will be held and used
- The right of access: to see your practitioner'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 practitioner to make changes to your personal information if it is incomplete. Please note that if any individual is factually wrong, then changing records of personal data will be falsification
- The right to erasure: for you to request your practitioner to erase any information they hold about you – please see below for further information regarding this.
- The right to restrict processing of personal data: you have the right to request limits on how your practitioner 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 practitioner 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: 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

Practitioner's Rights: Your practitioner has to keep the records of your 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 practitioner can move records between their computers and IT systems, as long as your details are protected from being seen by others without your permission.