



JANINE CLINTON-SMITH - I.I.R. M.A.R. H.A.
15 ASHLEY LANE, HENDON, LONDON NW4 1HD
TEL 020 8203 1625 / 07958 983834 (Fully Qualified & Insured - No Cards Accepted)
www.janineclintonsmith.co.uk

PRIVACY (& CONSENT) NOTICE - YOUR PERSONAL INFORMATION & GENERAL DATA PROTECTION REGULATION (GDPR) POLICY

GDPR policy effective from May 25, 2018. This tells you what personal information I hold, why, and what your rights are. Please complete and sign the statement of consent before your first appointment.

THE PURPOSE OF PROCESSING CLIENT DATA

In order to give professional Holistic treatments, I will need to gather and retain potentially sensitive information about your health. I will only use this information for informing holistic treatments and associated recommendations concerning aspects of health and wellbeing which I will offer to you.

LAWFUL BASIS FOR HOLDING AND USING CLIENT INFORMATION

As a full member of the Association of Reflexologists, I abide by the AoR Code of Practice and Ethics. The lawful basis under which I hold and use your information is my legitimate interest i.e. my requirement to retain the information in order to provide you with the best possible 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 AoR Confidentiality as defined in the AoR Code of Practice and Ethics.

INFORMATION HELD

The following information is collected from each client in order to give professional treatments. I will only use this for informing your treatments and any advice I give as a result of your treatment. The information held is:

- Name, address and telephone numbers
- Age and Medical history
- Current medical issue(s) including menstrual cycle (if fertility case)
- Lifestyle, Diet & Exercise
- Treatment details and related notes (which I will take after each consultation) are recorded on paper.

HOW LONG I RETAIN YOUR INFORMATION FOR

I will keep your information for the period of 8 years from your last appointment in accordance the requirements of CNHC and insurance 'claims occurring'. Your data will not be transferred outside the EU.

PROTECTING YOUR PERSONAL DATA PROCESSES AND SECURITY

All information is given by the client at the first consultation/treatment in the form of client consultation forms. These forms are kept in a Client Folder in the treatment room in my locked residence.

When the client ceases to have treatments with me, the client file is secured in my locked residence.

All client records are retained for EIGHT years then disposed of by shredding.

I am committed to ensuring that your personal data is secure.

All client records are kept manually on paper. No client data is processed on computer or electronically.

Clients may see their record card at any time and can request a copy if desired.

Occasionally children under 16 years are treated for specific problems. Such consultation and treatment is always in the presence of a parent and no notes are kept.

In the unlikely event of client data being lost/stolen, the ICO will be notified if it is deemed necessary to do so, in consultation with the client, under the Regulations.



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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 records of your personal information, so you can verify what is held.*
- The right to rectification: *To tell your therapist to make changes to your personal information if incorrect.*
- The right to erasure: *For you to request your therapist to erase any information they hold about you*
- The right to restrict processing of personal data: *The right to request limits on how your details is used.*
- The right to object:
To be able to tell your therapist you don't want them to use certain parts of your information, or only to use it for certain purposes.
- 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.

DECLARATION

I have seen this document and understand that you will hold my personal information, using it in order to provide me with the best possible treatment options and advice in line with the statements above.

I have received a copy of this document.

Name:

Date:

Signature:

Note: for children under 16 a parental or guardian signature is required.