



## **Terms**

Each therapist at the Withdean Treatment Rooms is an independent practitioner, the term `we`, `us` and `our` given below relates to your therapist/s.

We take the protection of your privacy seriously and will only use your personal information to deliver the treatments and services that you have requested and to meet our legal responsibilities.

### **How do we collect information from you?**

We have obtained information about you when you engaged us to deliver your treatment and you or your carer (such as a guardian or parent) relayed to us and subsequently any other information we obtained from you that we feel is relevant to your care.

### **What type of information do we collect from you?**

This can/might include but is not limited to name, address, telephone number, email address, occupation, sport and hobbies, doctors name, any medication, previous injuries, operation, medical procedures, life events and your present injury plus treatment requirements, results of tests, treatment conducted and the outcome. Depending on the therapist this may be recorded on paper or via computer application.

### **How is your information used?**

In general terms, and depending on which services you engage us to deliver and as part of providing our agreed services we may use your information to;

- contact you by post, email or telephone, (marketing emails will be with your consent).
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations

We are also required by legislation, other regulatory requirements and our insurers to retain your data when we have finished your treatments. The period of retention required varies with the applicable legislation but can typically be up to 20 years after your last treatment. For continuation of your care and future treatments this may be longer but after the above period the legal requirement to do so has passed.

### **Who has access to your information?**

We will not sell, rent or give your information to third parties.

We will not share your information with third parties for marketing purposes.

On written, signed request by yourself we can provide the information we have about you and your treatments to other parties such as your doctor.



### **Third Party Service Providers working on our behalf**

Our online booking system is run by [Appointment-Plus](#) who are fully compliant with the General Data Protection Regulation (GDPR). They have a strict privacy policy in place so will not sell or share user data and are SSAE16 SOC 2, Type 2 plus HIPAA compliant.

As per Privacy Shield regulations they have strict policies on secure data transfer outside of the European Union and follow appropriate, industry standard security measures and precautions including notifying regulators and users of any breaches.

Likewise, we may occasionally send emails with relevant information such as offers, news etc. via [MailChimp](#) who are also GDPR compliant and are EU-US and Swiss-US Privacy shield certified and SOC II Type 2 compliant.

### **Web Site**

We may track visits to our website using Google Analytics for statistical purposes, where your location and what pages you visit will be tracked – however we do not have access to your name or other private information purely from your website visit. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

### **How you can access and update your information**

Keeping your information up to date and accurate is important. We commit to regularly review and correct where necessary the information that we hold about you. If any of your information changes then please let us know. You have the right to ask for a copy of the information that we hold about you.

### **Security precautions in place to protect the loss, misuse or alteration of your information**

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you send to us, and as such you do so at your own risk.

Once we receive your information, we will strive to ensure its security on our systems if it is stored on them. Likewise any paper files we have are stored in a locked cupboard in a locked room.

### **Your rights**

#### **Access to your information:**

You have the right to request a copy of the personal information about you that we hold.

#### **Correcting your information**

We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe is not correct.



### **Deletion of your information:**

(As a reminder, we are required by legislation, other regulatory requirements and our insurers to retain your data when we have finished your treatments. The period of retention required varies with the applicable legislation but can typically be up to 20 years after the last treatment.)

After the above legal requirement has been met, if relevant, you have the right to ask us to delete personal information about you where;

- You consider that we no longer require the information for the purposes for which it was obtained
- You have validly objected to our use of your personal information or/and the use of your personal information is contrary to law or our other legal obligations
- Where we are using your information with your consent, but you now withdrawn your consent - see 'withdrawing consent to use your information' below.

### **Restricting how we may use your information:**

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to the use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

### **Withdrawing consent to use your information:**

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purposes for which consent was given.

### **Complaints**

We will always seek to resolve directly all complaints about how we handle your personal information but you also have the right to lodge a complaint with the Information Commissioner's Office at;

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Please let us know if you have any questions or concerns to any of the above.

Date: 24<sup>th</sup> May 2018