

GENERAL DATA PROTECTION REGULATIONS (GDPR)

1 The Purpose of processing Client Data

In order to give professional reflexology, massage and holistic treatments, I have to gather and retain potentially sensitive information about your health. I would only use this information for advising you on reflexology, massage, holistic treatments and/or associated recommendations concerning aspects of health and wellbeing that I might offer you.

2 Lawful Basis for holding and using Client Information

As a full member of the Association of Reflexologists (the "AoR") and the CNHC, I abide by the AoR and CNHC Code of Practice and Ethics. The lawful basis under which I would hold and use your information would be for my legitimate interest, which is my requirement to retain information in order to provide you with the best possible treatment options and advice.

As I would hold special category data (i.e. health related information hereinafter called the "Additional Condition") I would use this information to fulfil my role as a health care practitioner bound under the AoR and CNHC Confidentiality as defined in the AoR and CNHC Code of Practice and Ethics.

3 Additional Condition: What information I retain and for what purpose

In order to give professional reflexology, massage and holistic treatments, I need to ask for and retain information about your health. I would only use this for advising on reflexology, massage and holistic treatments and/or any advice I might give resulting from your treatment(s). The information which would be retained is:

- Your contact details
- Medical history and other health-related information (which I take from you at the first consultation)
- Treatment details and related notes (taken after each treatment)

I would **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 prior consent in writing.

4 How long I would retain your Information

I would keep your information for the following periods:-

- a. 'claims occurring' insurance: (records to be kept for 7 years after last treatment)
- b. the law regarding children's records (records to be kept until the child is 25 or if 17 when treated, then 26)
- c. the CNHC's requirement for retaining the information for 8 years

Your data would **NOT** be transferred outside the EU without your prior written consent.

5 Protecting your Personal Data

I would be 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 that I collect from clients.

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

- Appointment times
- Reflexology, massage, holistic treatments information and/or information related to your health
- Special offers and promotions (*you may unsubscribe from this at any time*)

6 Your Rights

If you provide medical/health information and receive treatment(s), or if you provide medical/health information prior to a first treatment but do not have a treatment, then:-

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/>

Should you wish to exercise any of your rights under GDPR, you should contact the Data Controller/Processor, Amanda Jane Nash

Should you be dissatisfied with the response, you can complain to the Information Commissioner's Office; their contact details are at: www.ico.org.uk

7 Therapist's Rights

Should you not agree to your therapist keeping records of information about you for your treatments, or if you would not allow them to use the information in the way they needed to for treatments, the therapist would not be able to treat you.

The therapist is required to keep records of treatment(s) for the periods as set out in clause 4, which may mean that even if you should ask them to erase any details about you, they would still have to keep such details until those periods had expired.

The 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.

8 Email or Text Enquiries

With regard to the above clauses; **please be aware** that should you send me any sensitive medical/health information, I would only use such information should you proceed to a treatment at which time I would require your signed consent to the above terms for me to retain such data or alternatively, in the event that you decline treatment and you so request, I would erase such information.