

## **Privacy Policy**

The lawful basis for processing your data is Legitimate interest (Article 6) and Special data: health (Article 9 (2) h).

### **Initial contact/ making an appointment**

#### **You may wish to provide your information when:**

- You choose to contact me for an appointment.
- To request information from me.

#### **Data that I collect.**

- Your first name and last name.
- Your contact information including a telephone number and E-Mail address.
- A brief reason for requesting an appointment, should you choose to provide that information.

#### **What will I do with the data you provide?**

- It allows me to provide you with the information requested and/ or to offer you an appointment and provision of service.
- Your data will be used to enable me to contact you with your requested service. I will contact you using the same method by which you contacted me unless you give me permission to use another method of contact.
- Should you book and attend an appointment your data will be transferred to your clinical record and your email and or text will be deleted once your appointment has occurred. If you do not wish to make an appointment your data will be deleted.

#### **Security of your data.**

I am committed to ensuring that your information data is securely protected. My Policy for maintaining the security of your data stored electronically details how this is done, for example, securing personal computers with private logins and passwords.

#### **Web links and cookies.**

My website may contain links to other websites of interest. However, once you have used these links to leave my site, you should be aware that I don't have any control over the other website.

Therefore, I cannot be responsible for the protection and privacy of any information which you provide whilst visiting these sites. I strongly suggest that you read any privacy notice attached to an individual site.

My website does not use cookies

### **At your appointment**

#### **What information is being collected?**

Information provided by the client and recorded by your Sports Therapist will consist of personal identifiable information and sensitive personal data appertaining to your health and wellbeing. This is contained in the Sports Therapy Consultation Form you complete and your treatment notes from your appointment.

#### **Who is collecting it?**

The Sports Therapist looking after you will collect your data. That is Rachel Sutton.

**How is it collected?**

Data which is freely and voluntarily provided by the client will be stored in paper format in a locked filing cabinet with a file sign in and out sheet. A separate list of all files held, which will consist of a list of client name and contact details will be held in an encrypted electronic file.

**Why is it being collected?**

To formulate a medical health care record including any contraindications to treatment that you may have and any clinical and/or therapeutic treatment interventions.

**How will it be used?**

Your records are stored solely for the purpose of maintaining a medical record. Your medical records are designed to keep a historical and up to date evidence base of your health care provision, progress and rehabilitation.

**Who will it be shared with?**

Your data will not be shared without your written consent, following a discussion with you as to the reason for sharing data. Data would only be shared with your consent with your GP or NHS Health Care Professional.

There are some exceptions which appertain to serious life threatening situations, infections and dangerous diseases and requests from the police force.

**What will be the effect of this on the individuals concerned?**

To promote and enhance your healthcare, improve the quality of your life and provide health care protection and safety.

**Is the intended use likely to cause individuals to object or complain?**

No, because the clients' healthcare and wellbeing is the basis of my business and therefore, I always act in the best interests of the client.

**How is my data protected?**

I am committed to ensuring that you information data is securely protected.

Data in paper format is held in a locked filing cabinet. A system is in place to monitor data files in and out and when they are transported to a treatment room they will be transported in a secure box. I am committed to ensuring that you information data is securely protected. My Policy for maintaining the security of your data stored electronically details how this is done, for example, securing personal computers with private logins and passwords, encrypting electronic data files.

**The right to object to data processing**

In accordance with GDPR, individuals have the right to object to:

1. Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
2. Direct marketing (including profiling)
3. Processing for purposes of scientific/historical research and statistics.

I will inform individuals of their right to object "at the point of first communication" and I have clearly laid this out in this privacy notice.

A client's data will form part of their medical record and therefore, I need to input certain specific data into my records. I cannot see or treat anyone who objects to specific data being provided as not providing that data could place the client at risk if assessments and treatments are carried out.

Therefore, I can:

1. Demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.

2. Demonstrate that processing is for the establishment and exercise of providing assessment and treatment and/or the client's defence of legal claims.

**Controlling your personal information**

You have the right to request access to any of your data held by me. Requests for a copy of your data must be in writing and your identification will be checked. There is a £10 fee for a copy of your records, where the records are more than 40 days old. The requested data will be given to you within 40 calendar days.

If your personal and sensitive data should change, then please inform me immediately in order that I can update your personal records. Request to rectify data will happen within one calendar month of the request being received.

Your data will be held for 7 years unless the client is a minor at the time of treatment, in which case it will be held until their 26<sup>th</sup> birthday. After that your data will be securely destroyed.

**Disclaimer should a client request their Right to be Forgotten**

Should a client Request to be Forgotten they will be contacted to explain that their Right to be Forgotten has been declined as, due to the Statute of Limitations in the UK, best practice is to keep records for 7 years. For Under 18s, records will be kept until their 26<sup>th</sup> birthday. The purpose of keeping the records for this period of time is in order to defend myself in a claim situation.

**If there is a data breach**

If there is a breach which compromises your data that I hold, I will contact you within 72 hours of knowing about that data breach and if required, report it to the ICO (Information Commissioner's Office).

If you think there is a problem with how I am handling your data then you have the right to complain to the ICO.