

## **CLIENT PRIVACY POLICY**

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This privacy policy contains information on how and why I collect, store, use and share your personal data. It also explains your rights in relation to this data and how to contact me or supervisory authorities in the event you have a complaint.

When I use your personal data I am regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and I am responsible as 'controller' of that personal data for the purposes of the GDPR. My use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and my duty of confidentiality.

**Personal data** is any information relating to an identified or identifiable individual

**Special category personal data** is data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data and data concerning health, sex life or sexual orientation.

### **Personal Data Collected**

I will collect various personal data depending on how and why you have contacted me.

- Your name, address and telephone number, your email address and mobile phone number.
- Information on your health relating to the matter in which you are seeking my advice.
- Personal identifying information, such as your eye colour, iris structural details for iridology purposes only, or your height and weight.
- Any parts of your standard medical records or records from other therapists that are relevant and that you offer to me for my records and processing.

### **How your personal data is collected**

Normally I collect all of this information from you, direct. However, I may also collect information at your request from other health professionals that you have visited.

### **How and why I use your personal data**

Under data protection law, I can only use your personal data if I have a proper reason for doing so, eg:

- to comply with legal and regulatory obligations;
- for the performance of an agreed service to you;
- for legitimate interests of myself or those of a third party; or
- where you have given consent.

A legitimate interest is when I have a business reason to use your information, so long as this is not overridden by your own rights and interests.

The list below explains what I use (process) your personal data for and my reasons for doing so:

I use your personal data to:

- Provide health based services to you with your consent.
- Other processing necessary to comply with professional, legal and regulatory obligations that apply to my business.
- To comply with legal and regulatory obligations
- For my legitimate interest so I can deliver the best service to you
- Updating and enhancing client records
- For the performance of an agreement with you or to take steps at your request before entering into such an agreement
- Marketing services to existing and former clients

### **Promotional communications**

- I may use your personal data to send you updates (by email, text message, telephone or post) with information that might be of interest to you and/or information about my services.

- I have a legitimate interest in processing your personal data for promotional purposes. This means I do not usually need your consent to send you promotional communications. However, where consent is needed, I will ask for this consent separately and clearly.
- I will always treat your personal data with the utmost respect and never sell OR share it with other people or organisations for marketing purposes without your express consent.

You have the right to opt out of receiving promotional communications at any time by contacting me by email to [info@bodyelectronics.co.uk](mailto:info@bodyelectronics.co.uk)

I may ask you to confirm or update your marketing preferences if there are changes in the law, regulation, or the structure of my business.

### **Who I share your personal data with**

- I can share personal data with other health professionals with your express consent.
- I may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with legal and regulatory obligations.
- I will not share your personal data with any other third party.

### **Where your personal data is held**

Information may be held at my place of work, my email service provider for data transmitted by email, other health professionals as described above (see ‘Who I share your personal data with’). (My email service provider is chosen such that their servers are entirely UK based.) Most health information comprises a single copy and solely in printed format which cannot be accessed electronically. The exception to this is information imparted in email conversations.

### **How long your personal data will be kept**

I will keep your personal data after I have finished the service to you. I will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that I treated you fairly;
- to keep records as long as stipulated by professional insurance policies, currently this is AT LEAST 7 years since the last time you saw me professionally;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy.

When it is no longer necessary to retain your personal data, I will delete or anonymise it.

### **Transferring your personal data out of the EEA**

Your data are not transferred outside the EEA except by an unusual and express request from yourself.

### **Your rights**

You have the following rights, which you can exercise free of charge:

- **Access** The right to be provided with a copy of your personal data
- **Rectification** The right to require me to correct any mistakes in your personal data
- **To be forgotten** The right to require me to delete your personal data—in certain situations
- **Restriction of processing** The right to require me to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data
- **Data portability** The right to receive the personal data you provided to me, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
- **To object** at any time to your personal data being processed for direct marketing (including profiling); in certain other situations to continued processing of your personal data, eg processing carried out for the purpose of legitimate interests.
- **Not to be subject to automated individual decision-making:** The right not to be subject to a decision based solely on automated processing (including profiling)

For further information on each of those rights, including the circumstances in which they apply, please see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise any of those rights, please email, or call – see 'How to contact me'; let me have enough information to identify you and let me know what right you want to exercise and the information to which your request relates.

### **Keeping your personal data secure**

I have appropriate security measures to prevent personal data from being accidentally lost, used or accessed unlawfully. I am the only person with access to the data. Processing your information is subject to a duty of confidentiality.

I will notify you and any applicable regulator of a suspected data security breach where I am legally required to do so.

### **How to complain**

I hope I can resolve any query or concern you may raise about my use of your information. The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: [0303 123 1113].

### **Changes to this privacy policy**

This privacy policy was published on 25th May 2018.

I may change this privacy policy from time to time, when I do I will inform you via my website

### **How to contact me**

Please contact me by, email or telephone if you have any questions about this privacy policy or the information I hold about you. Contact details are shown below:

### **My contact details**

Peter Hinde

[info@bodyelectronics.co.uk](mailto:info@bodyelectronics.co.uk)

0161 2833814