

# **Louise White Massage Therapist Privacy Policy**

This privacy policy is for Louise White Massage Therapist, 17 Southwell Road, Lowestoft NR33 0RW. Telephone 07872309697. Email [mamaactive1@gmail.com](mailto:mamaactive1@gmail.com)

## **Policy Purpose**

This policy outlines my privacy and data protection policy, and thus how I comply with the GDPR.

## **Policy Content**

### **1.The data that I process and how it flows into, through and out of my business.**

Data comes into my business in 8 ways:

- a. Via email messages to me from potential clients (PC) and clients(C) that have my email
- b. Via text messages (as above)
- c. Via my website (to be created)
- d. Via Facebook Messenger to my business page
- e. Via Facebook Messenger to my personal page
- f. Via phone calls and the written notes I take for these
- g. Via face to face consultation
- h. Via event sign in sheets

It flows through my business via:

- My laptop - which is used at home and away from the home for work and study purposes
- My smart phone - everywhere I go
- My paper file - occasionally from home to a client's house and back if I am treating outside the home or at an event e.g. providing pre and post event massage.

Data very rarely flows out of my business and ONLY at the request of the client. The only scenarios where this would happen are:

- Client requests I share information with another health professional e.g. GP, midwife or physiotherapist.

In the above instance I will take all reasonable steps to ensure that:

- The request is from the client i.e. requesting identification and confirmation of known data to identify and authenticate an individual
- It is the most expedient option – wherever possible clients would be provided with their own data for onward sharing.
- Data is appropriately secure e.g. encrypted prior to being sent.

## **2. The personal data I hold, where it came from, who I share I with and what I do with it.**

### Information Asset Register

- I hold personal information about my clients that they have given me.
- This includes name, address, contact details, age, GP practice/name.
- I also hold health and wellbeing information about them which I collect from them at their first consultation to ensure treatment is safe and effective.
- I also hold relevant lifestyle information e.g. hobbies, levels of activity, stress levels and other factors which can impact pain and injury recovery.
- I hold information about each treatment that they receive from me.
- I don't share this information with anyone unless requested by the client to do so (see previous section).
- I use the information I have in order to inform my treatments and provide them with any appropriate advice within the realms of the treatment, my professional experience and qualifications.
- I keep all data for:
  - a. claims occurring insurance: for which I am required to keep my records for 7 years after the last treatment or class attended.

## **3.The lawful bases for me to process personal data and special categories of data.**

I process the personal data under:

- **Legitimate interest:** I am required to retain the information about my clients in order to provide them with the best possible treatment options and advice.
- **Special Category Data - Health Related:** I process under special category data, therefore the additional condition under which I hold and use this information is for me to fulfill my role as a healthcare practitioner, bound under the ISRM and CTHC Codes of Practice and Ethics.

#### **4. Privacy Notice**

Individuals need to know that their data is collected, why it is processed and who it is shared with. This information is included in my privacy notice and discussed at first consultation. Prior to consultation when a client books an appointment the privacy policy is emailed to them as an attachment or given a link to my website.

#### **5. Processes to recognise and respond to individuals' requests to access their personal data.**

All individuals will need to submit a written request to access their personal data - either by email or by letter. I will provide that information without delay and at least within one calendar month of receipt. I can extend this period by a further two months for complex or numerous requests (in which case the individual will be informed and given an explanation).

I will identify the client using reasonable means, which because of the special category under which I process data, will be photographic ID. I reserve the right to ask for personal data or treatment data to be confirmed by the client prior to release if the identity of the applicant is in any doubt

I will keep a record of any requests to access personal data.

#### **6. Processes to ensure that the personal data I hold remains accurate and up to date.**

I will ensure that client information is kept up to date during our treatments, and will update client information as I am informed of any changes.

#### **7. Schedule to dispose of various categories of data, and its secure disposal.**

Once a year I will review my client information and will place dormant clients in a separate file. This will be assessed each month to ensure that data that is no longer required to be kept under GDPR is destroyed securely.

#### **8. Procedures to respond to an individual's request to restrict the processing of their personal data.**

If I receive a request to restrict processing of an individual's data then I will respond to this as soon as is practicably possible and no later than one month explaining that data will be retained but not used for marketing purposes which is the only scenario in which restriction is likely to be requested.

#### **9. Processes to allow individuals to move, copy or transfer their personal data from one IT environment to another in a safe and secure way, without hindrance to usability.**

Should clients wish their data to be copied or transferred I would work with the client to ensure that this is done in a way that was most appropriate for them - for example this could be an electronic summary of treatment received and progress made, copies of individual treatment records.

#### **10. Procedures to handle an individual's objection to the processing of their personal data.**

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

#### **11. Processing operations that constitute automated decision making.**

I do not have any processing operations that constitute automated decision making and therefore, do not currently require procedures in place to deal with the requirements.

#### **12. Data Protection Policy**

This document forms my privacy and data protection policy and shows how I comply with GDPR.

This is a live document and will be amended as and when any changes to my data processing takes place, at the very least it will be reviewed annually.

### **13. Effective and structured information risks management**

The risks associated with my data, and how that risk is managed is as follows:

- Theft of electronic devices - both have password locks on all electronic devices which are changed regularly and are not shared with anyone.
- Break in to office/treatment space - all my paper files are stored in a locked cabinet in my house. No one else has the key but me.
- Theft of paper files while travelling – while travelling paper files for clients are kept on my person at all times and never left unattended in a car or similar.

### **14. Named Data Protection Officer (DPO) and Management Responsibility**

Although not required to have a named DPO, as the sole employee I am the DPO and will ensure that I remain compliant with GDPR.

### **15. Security Policy**

All my electronic devices are standard well known brands with industry recognised secure software.

### **16. Data Breach Policy**

A personal data breach means a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

**Data Protection Policy created: 23<sup>rd</sup> May 2018**

This is a live document and will be updated as and when changes occur.

**Date of Next Review: 22<sup>nd</sup> May 2018**

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**Signed: Louise White**