



## **Privacy Policy**

### **My contact details**

Name: Claire Smith MAR  
Address: c/o Just Beauty, 65a Boundary Road, West Bridgford, Nottingham, NG2 7DB  
Tel: 07796 143313  
Email: [info@clairesmith-reflexology.co.uk](mailto:info@clairesmith-reflexology.co.uk)

### **The type of personal information I collect**

In order to give professional reflexology treatments, I will need to ask for and keep information about you and your health. I will only use this for informing reflexology treatments and any advice I give as a result of your treatment.

The information to be held is:

- Your contact details - including your name, address, telephone number and email address
- Your medical history and other health-related information – including date of birth
- Treatment details and related notes

### **How I collect the personal information and why I hold it**

The personal information I process is provided directly by you for the purpose of informing reflexology treatments and any advice I give as a result of your treatment.

I use the information that you have given me in order to provide you with the best possible treatment options, support and advice.

I will not share this information with anyone else, other than as required for legal process, without gaining your explicit consent and explaining why it is necessary.

### **Lawful basis for holding and using client information**

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases I rely on for processing this information are:

I have a legitimate interest i.e. my requirement to retain the information in order to provide you with the best possible treatment options and advice.

As I hold special category data (i.e. health related information), the additional condition under which I hold and use this information is: for me to fulfil my role as a health care practitioner bound under the Association of Reflexologists (AoR) Confidentiality as defined in the AoR Code of Practice and Ethics.

I have a legal obligation:

- 1.1. 'Claims occurring' insurance: (records to be kept for 7 years after last treatment).
- 1.2. Law regarding children's records (records to be kept until the child is 25 or if 17 when treated, then 26).

### **How I store your personal information**

#### **Protecting your personal data**

I am 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 I collect from you.

I will contact you using the contact preferences you have given me.

I will keep your information for the following length of time:

- Adult records - 7 years after last treatment
- Children's records - until the child is 25 or, if 17 when treated, then 26

I will then dispose of your information by deleting digitally held information and shredding paper documents.

## **Your data protection rights**

Under data protection law, you have rights including:

- Your right of access - You have the right to ask me for copies of your personal information.
- Your right to rectification - You have the right to ask me to rectify personal information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete.
- Your right to erasure - You have the right to ask me to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask me to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that I transfer the personal information you gave me to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you.

If you wish to exercise any of these rights, please contact me at:

[info@clairesmith-reflexology.co.uk](mailto:info@clairesmith-reflexology.co.uk) or telephone me on: 07796 143313

## **Your therapist's rights**

Please note:

If you don't agree to me (your therapist) keeping records of information about you and your treatments, or if you don't allow me to use the information in the way I need to for treatments, I may not be able to treat you.

I have to keep your records of treatment for a certain period as described above, which may mean that even if you ask me to erase any details about you, I might have to keep these details until after that period has passed.

I can move your records between my computer and IT systems, as long as your details are protected from being seen by others without your permission.

## **How to complain**

If you have any concerns about my use of your personal information, you can make a complaint to me using the contact details above.

You can also complain to the ICO if you are unhappy with how I have used your data. The ICO's address and contact details:

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow  
Cheshire, SK9 5AF  
Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>