

Privacy notice

Fiveways Therapy Centre
2 Kenwood Road
Sheffield S7 1NP

Purpose of privacy notice

The processing of personal data is governed by the General Data Protection Regulation.

The regulation gives you the right to be informed, which means we have to give you information about the way in which we use, share and store your personal information.

Who are we?

Joe Robson is the data controller for **Fiveways Therapy Centre**. This means I decide how your personal data is processed and for what purposes when your initial enquiry is directed to the centre.

Whose information does this privacy notice apply to?

This privacy notice applies to information we collect from:

- prospective patients;
- people who subscribe to our newsletters;
- visitors to our website;

This privacy notice is only relevant for initial contact through the Fiveways website directed to the Fiveways Therapy Centre in general and as such the only information generally held is name email and phone contact details and where relevant, a small amount of medical data which may be in email form.

Should you contact individual practitioners directly through the website then you need to refer to their own privacy notices.

What is personal data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. Examples of personal data we may hold about you include your contact and appointment details.

Special category data is a sub-category of personal data revealing more detail. The only data held by myself in this regard would be information passed on to me that may help to understand whether treatment is relevant to you.

How do we process your personal data?

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use your personal data for the purposes set out below.

Sections 1 – 15 apply to Fiveways prospective patients.

1. We use your name, address, telephone number and email address to make and rearrange appointments. We are unable to send or receive encrypted emails so you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send us is within the bounds of the law.
2. We use your name, address, telephone number and email address, only if we have your explicit consent, to send you marketing materials. We are unable to send or receive encrypted emails so you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send us is within the bounds of the law.
3. Some patients and prospective patients return pre- 1st appointment questionnaires or tell us about their medical conditions and medication by email or online enquiry forms. We are unable to send or receive encrypted emails so you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send us is within the bounds of the law.
4. We keep accident records for any patients, visitors or staff who are involved in accidents at our clinic in accordance with UK Health and Safety legislation including the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) to comply with the law and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.

Section 16 applies to those who complain about our services

5. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually have to disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We may need to provide personal information collected and processed in relation to complaints to our insurance company.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

Sections 17 and 18 apply to subscribers to our newsletters (not currently applicable)

6. We maintain and use records of subscribers to our newsletters, only with their consent, for marketing purposes.
7. We use a third party provider, (insert name of third party provider), to deliver our e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For information, please see (insert name of third party provider) privacy notice.

Sections 19 – 23 apply to our website users

8. When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

9. We use website cookies to improve user experience of our website by enabling our website to 'remember' users, either for the duration of their visit - using a 'session cookie' - or for repeat visits - using a 'persistent cookie'.
10. Our website search is powered by Google. Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by us or any third party.
11. We use a third party service, **Wix**, to host our website including publishing our blog. This site is hosted at **Wix**, which is run by **Wix**. We use a standard **Wix** service) to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. **Wix** requires visitors that want to post a comment to enter a name and email address. For more information about how **Wix** processes data, please see <https://www.wix.com/about/privacy>

Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared:

- with named third parties only with your explicit consent;
- with the relevant authority such as the police or a court, if necessary for compliance with a legal obligation to which we are subject e.g. a court order;
- with your doctor or the police if necessary to protect yours or another person's life;
- with the police or a local authority for the purpose of safeguarding a children or vulnerable adults; or
- with my insurance company in the event of a complaint or insurance claim being brought against me; or
- my solicitor in the event of any investigation or legal proceedings being brought against me.

For further details about the situations when information about you might be shared please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/personal-information/sharing-my-info/>

How long do we keep your personal data?

Text or email communications and contact details from prospective patients who decide not to have treatment will be deleted as soon as this becomes known and contact details deleted.

Fiveways does not retain contact details or personal data once a patient/client has chosen a practitioner and been passed over to that practitioner.

Electronic notes are checked monthly for relevant deletion.

In the event of my illness or death, I have nominated another qualified clinician to take over my responsibilities as data controller.

At any time you may request that changes are made to your contact details.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have certain rights with respect to your personal data as set out below.

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time. This right does not apply where we are processing information using a lawful purpose other than consent.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [This right only applies where the processing is based on consent or is necessary for the performance of a contract with you and in either case the we are processing the data by automated means].
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data, (where applicable) [This right only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics].
- The right to be informed if your data is lost. We shall also inform the Information Commissioner's Office in accordance with the time limits in the GDPR.
- The right to lodge a complaint with the Information Commissioner's Office.

For further details about these rights please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact me at
Joe Robson
Fiveways Therapy Centre
2 Kenwood Road
Sheffield
S7 1NP
0114 345 9880

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

END OF PRIVACY NOTICE