**Data Protection Policy**

**​**Penny Groom – Holistic & Remedial Massage is a sole trader operating within Norfolk UK providing Holistic & Remedial Massage therapy focusing mainly on massage. She is committed to conducting her business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of Penny Groom – Holistic & Remedial Employees and Third Parties in relation to the collection, use, retention, transfer, disclosure and destruction of any Personal Data belonging to Penny Groom - Holistic & Remedial Massage’s clients (i.e. the Data Subject).

**What is personal Data**

**What data is collected**

**Where is your data stored**

**How is the documented data protected**

**How long is your data kept**

**What function/ reason is there for collecting your data**

**When you visit the website**

**When you email**

**When you phone (Call, text, Whatsapp)**

**When you contact by Social Media**

**When you attend an event**

**Your Rights**

**Complaints & Queries**

**Disclosure of Personal Information**

**What is personal data?**

Personal data is any information (including opinions and intentions) which relates to an identified or Identifiable Natural Person. Anyone who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process Personal Data.

**What data is collect**

Name. Address. Contact Telephone Numbers. Emergency Contact Number. Health Practitioners name and clinic. Full Medical History. Lifestyle Details. Treatment details. Practitioner Opinions and Intentions for future treatments. consultation forms, informed consent forms, treatment records

**Where is your data stored**

Written paper documents: stored safely – No electronically stored notes.

Contact phone numbers: stored securely on practitioners phone via password protection. This is backed up on yahoo mail not to the cloud. In case of unauthorised access to phone, all data stored such as contacts are erased after failed 10 password attempts.

Gsuite email contacts; Only I, Penny Groom, have sole access to this email address and do not share the information that you provide me. For more information please see G-Suites terms of service and privacy. There is 3 verification methods google can use in case of suspicious activity. Sensitive emails are printed, stored with written documents and deleted regularly. Although I do not save email contacts and have turned the automatic email saver off.

Yahoo email (not used for clients) With password and second verification access enabled which is connected to Iphone. This is used for businesses other than my clients. Please see yahoo terms and privacy notices for more information.

**How is the documented data protected**

**Documentation**: stored securely on premises. No access to unauthorised persons.

**IPhone**: Password protected & Finger print ID required.

In the process of safeguarding Personal Data all information is kept safe from unauthorised or unlawful disclosure, access, alteration, Processing, transfer or destruction.

All data wherever possible is kept Anonymised Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.

**Laptop:** For any electronic data stored a strong password is created & changed regularly to protect from malicious hacking and the designated drivers WILL NOT be uploaded to any cloud based server. Antivirus software has also been set up. All data will be backed up frequently to prevent accidental deletion & data loss.

**How long is your data kept**

**Paper Documents**; will be stored for 5 years from the last appointment.

**Text**: Automatically deleted after 30 days

**Emails: Regularly updated & cleared of unnecessary emails; no more than 1 year, unless legal reasons require it.**

**Google Analytics: 26 Months**

**Online Booking: Deleted from 1 year from last booking**

**What function/ reason is there for collecting your data**

Personal and medical data is collected on each client and is used to provide the highest level of care and efficient treatment.

Name and contact details are stored to contact the patient if the appointment needs to be changed. Medical and lifestyle history details are collected to enable the treatment to proceed safely and effectively. Date of birth is established to provide age appropriate treatment. Emergency contact details are collected as is the information on doctors practice in the event that the patient requires emergency assistance a notifiable person can be appointed.

The processing of this data is used to monitor the condition and health of individuals and take decisions about their current and future treatment and their expected outcomes to be able to advise them on improving their conditions further.  This is done by the qualified authorised personnel only.

Your data will not be passed on to a third party or used in advertising or promotional uses without formal written expressed consent on a separate form.

**How is consent collected**

Consent is any freely given, specific, informed and unambiguous indication of the Data Subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Informed written consent is collected to allow treatment to proceed. Without which NO treatment can take place. When the patient is under the age of consent (16) a parent or guardian may provide consent and must be present throughout the entire treatment. At any time the patient may withdraw their consent. In which case the treatment will be stopped and will not continue. The data of the treatment however will be stored under the earlier section.

Written consent is also received to allow the practitioner to have contact with their GP, health professional or medical insurance company with regards to their health or treatment. This is an opt-in system and not providing consent will not affect current or future treatment.

For advertising or promotional uses a separate form is provided to gain consent.

**When you visit the website**

I have set up [www.pennygroommassage.co.uk](http://www.pennygroommassage.co.uk) to advertise my business and take bookings for clinic sessions only. The use of cookies, google analytics and booking system is the only data processing that I knowingly allow and use on my website. To create this website I am a ‘User’ of wix.com. Please be aware Wix Privacy Notice, [here](https://www.wix.com/about/privacy) (as a user of my website you are named as a ‘user of a user’). Wix.com is committed to being GDPR compliant and is a processor of information allowing its users to be controllers of this information.

**Use of Cookies**

As a ‘user’ and a ‘user of a user’ of Wix.com the following cookies are used.

**Session (Transient) cookies:** these cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

**Persistent (Permanent/Stored) cookies:** these cookies are stored on your hard drive until they expire (i.e based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behaviour or user preferences for a specific site. (to change your cookie settings advice is given below)

**Google Analytics**

When someone visits [www.pennygroommassage.co.uk](http://www.pennygroommassage.co.uk) a third party service is used, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. This is done 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 I do want to collect personally identifiable information through this website, I will be up front about this. I will make it clear when I collect personal information and will explain what I intend to do with it.

**Booking online**

When booking online you are required to create an account using your email and a password to ensure your privacy and security. Your name, email and phone number is stored with any booking made. It is not used, shared or rented with anyone else. I will only use your information in connection with appointments made by you. I will ask and gain consent from you for any other information processing. Your details are collected into a contact list, which will be deleted within 1 year from your last booking. Wix.com is fully committed to adhering to the GDPR and allows you access to your information and to be forgotten. ([click here to view](https://support.wix.com/en/article/general-data-protection-regulation-gdpr))

**How to change your cookie settings**

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org/) or [www.allaboutcookies.org](http://www.allaboutcookies.org/).

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

**When you Email**

You come straight through to Penny on her gsuite account, no other person is authorised to use this email.

Click on [Google Privacy Notice](https://policies.google.com/privacy?hl=en) for more information about how data is used, processed, stored and secured.

Personal information may be required prior to your treatment for some or all of the following reasons; a) ascertain whether I can carry out a treatment. B) attend the appointment. c) contact you about the appointment before it occurs. d) payment. However, The only information recorded is your name, address & telephone number once you have booked an appointment; This is logged in a paper diary and your number on my mobile.

Although every care has been taken to ensure the security of emails & attachments, it cannot be guaranteed and you must take full responsibility for virus checking.

If you are unsure of the security of your email/computer or want to restrict where your personal data is saved **please do not use email to send any personal data or attachments.**  Please call Penny on 07775537404 to discuss sensitive personal information.

**When you Phone (Text, Whats app, Call)**

You come straight through to Penny on her iPhone, [using apples technology and security](https://www.apple.com/uk/privacy/). Personal information may be required prior to your treatment for some or all of the following reasons; a) ascertain whether I can carry out a treatment. B) attend the appointment. c) contact you about the appointment before it occurs. d) payment. However, the only information recorded is your name, address & telephone number once you have booked an appointment; This is logged in a paper diary and your number on my mobile. Calls are not recorded and messages are not shared with anyone else.

**When you contact by Social Media**

You can contact Penny directly via Twitter & Facebook, no third party is used. If you send a private or direct message it will not be shared with any other companies. Please be aware that messages on facebook business pages cannot be deleted; if you do not wish to disclose any personal information via these mediums please contact Penny on 07775537404

**When you attend an event**

Penny works with other independent businesses that she knows and trusts to create private events. In the event organisation is via herself, prior to the event she will disclose the event address, contact details of the host, a timetable with treatments and people’s names and any relevant medical information that has been disclosed that may affect the treatment to the relevant business/therapist/instructor. During the event people will fill out a paper consultation form and only show the therapists/instructors that they receive treatment from. These forms will also have the names of the therapists/instructors who provided them with treatment in case of future requirements. Each therapist will keep their own consultation forms and stored for up to 7 years, copies maybe requested from the other therapists/businesses/instructors for those clients that they treated for legal reasons. In the event that Penny works alongside venues that are organised by others information may come straight from the client or he organiser, non of this information is passed onto third parties. In the event that any legal action is taken against another independent therapist/instructor and Penny Holds the original copy the therapist/business/instructor is able to obtain the original copy from her. This information is used for insurance and safety purposes only. Non of the businesses/therapists/instructors used sell, rent or share this information to anyone else. If you need to contact any of the therapists/businesses/instructors from an event and do not have any of their details, please contact Penny.

**Your rights**

Under the Data Protection Act 1998, you have rights as an individual which you can exercise in relation to the information held about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

**Complaints or queries**

Penny tries to meet the highest standards when collecting and using personal information. For this reason, any complaints received are taken very seriously. Penny encourages people to bring it to her attention if they think that the collection or use of information is unfair, misleading or inappropriate and welcome any suggestions for improving procedures.

For any complaints please contact Penny in writing. In most cases a response to an access request will be prompt and in any event within 40 calendar days of receiving it. However, some types of personal data are exempt from the right of subject access and so cannot be obtained by making a subject access request. For more information, please see [Exemptions](https://ico.org.uk/for-organisations/guide-to-data-protection/exemptions/).

**Disclosure of personal information**

Upon request of copy of records a full unedited copy of all records will be produced in writing within one month of the request at no cost to the requester. Only the person the data is about may receive a copy unless the requester has legal guardianship over the data person. To be removed from records this request must be provided in writing and then any records of that patient will be destroyed unless there is a legal requirement to keep this information.

In many circumstances personal data will not be disclosed without consent. However, when a complaint is investigated, a life is in danger or the law requires it, for example, personal information will need to be shared with the organisation concerned and with other relevant bodies. Prior to disclosure the legitimacy of the request will be looked into and assistance seeked where necessary.

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