

Documented Created: 11th April 2018
Date of Last Review: 11th April 2018
Date of Next Review: 11th April 2019

GDPR: Data Protection Policy: Judi Needham-Crane
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Policy Purpose

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

GDPR Registration

I am not required to register with the ICO as I process personal data for the core business purposes. I do not store personal details electronically except telephone numbers and email addresses.

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 4 ways:

- a. Via email messages to me from potential clients and clients that have my email address.
- b. Via text messages and phone calls (as above)
- c. Via my website as a contact email.
- d. Via Facebook Messenger

It flows through my business via:

My laptop - which stays at home, smart phone - everywhere I go, paper file – which stays locked at home
The information does not flow out of my business.

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 given to me via consultation.
- This includes name, address, contact details, and, where appropriate, age. I also hold health and wellbeing information about them which I collect from them at their first consultation.
- I hold information about each treatment that they receive from me.
- I use the information I have 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 claims occurring insurance, for which I am required to keep my records for 7 years after the last treatment.
- No information is shared with anyone else.

3. 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 give me in relation to:

- Appointment times
- Treatment information or information relevant to your health
- Special offer and promotions (you may unsubscribe from this at any time).

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 this privacy notice and within any forms or letters I send to individuals, including at my first consultation with my client.

I have written a privacy notice for my website and for my clients, and have ensured that the privacy notice includes all of the information included in the ICO privacy notice checklist at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed#table>.

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

- All clients have the right to see records of their personal information.
- All clients have the right to rectification of held data.
- All clients have the right to erasure (the right to be forgotten)
- Full details of client's rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

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.

Client information will be reviewed annually and dormant clients will be stored in a separate file. This will be regularly assessed 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.

To access data held or to restrict processing, clients need to submit a written request - either by email or by letter. A record will be kept of any requests to access personal data.

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.

Clients can request that their data is copied or transferred. I would work with the client to ensure that this is done in a way that was most appropriate for them. I do not hold any treatment information electronically.

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.

11. Data Protection Policy

This document forms my data protection policy and shows how I comply with GDPR. It 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. As a sole trader, I have taken heed of the advice and guidance regarding GDPR provided by my professional membership organisation (AoR for my work as a Reflexologist).

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 - password locks on all electronic devices which are changed regularly and are not shared with anyone.
- Break in to office - all my paper files are stored in locked cabinet. I am the sole key holder.

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

As the sole trader I am the DPO and will ensure that I remain compliant with GDPR.

15. Security Policy

As outline above.

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.
- I understand that I only have to notify the ICO of a breach where it is likely to result in a risk to the rights and freedoms of individuals.
- Where a breach is likely to result in a high risk to the rights and freedoms of individuals, I will notify those concerned directly and without undue delay.
- In all cases I will maintain records of personal data breaches, whether or not they were notifiable to the ICO.

Data Protection Policy created: 11th April 2018

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

Date of Next Review: 11th April 2019

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Signed: Judi Needham-Crane

I consent to Judi Needham-Crane using and holding my information as outlined above, and understand that I may withdraw that consent at any time by email to yogawithjudi@icloud.com.

I have received a copy of this document.

Name:

Date:

Signature: