



Mandy Spurr  
Clinical reflexology

## Privacy Policy

### Contact Details:

Name: Mandy Spurr

Phone Number: 07761 988600

E-mail: [hello@reflexologywithmandy.co.uk](mailto:hello@reflexologywithmandy.co.uk) / [mandyspurrCRM5@outlook.com](mailto:mandyspurrCRM5@outlook.com)

### The type of personal information collected

In order to give professional reflexology treatments, I will need to ask for and keep information about 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 (address, telephone number and email address)
- Your date of birth
- Medical history and other health related information
- Treatment details and related notes
- Appointment dates and times

### How personal information is collected and why it is held

Most of the personal information processed is provided directly by you during our consultation for one of the following reasons:

- For informing reflexology treatments and any advice I give as a result of your treatment.
- For enabling efficient communication with you regarding your appointments and treatments.

The information is collected during our discussions and by completion of a medical information form.

The information you give is used to provide you with the best possible treatment options, support and advice.

This information is not shared with any third parties, unless legally required to, or with your specific permission.

## **Lawful Basis for holding and using Client Information**

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis I rely on for processing this information is that 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 AoR (Association of Reflexology) Confidentiality as defined in the AoR Code of Practice and Ethics.

## **How your personal information is stored**

### **Protecting your Personal Data**

I am committed to ensuring that your personal data is secure. In order to prevent unauthorized 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 keep your information for 7 years (or for a child, until the child is 25 or if 17 when treated, then until 26). I will then dispose of your information by deleting digital records and securely destroying physical records.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** – You have the right to ask 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 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 made a request, I have one month to respond to you.

Please contact me via the contact details above if you wish to make a request.

## Therapist's Rights

Please note:

- If you don't agree to me keeping records of information about you and your treatments, or if you don't allow use of the information in the way needed 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 for details about you to be erased, I may have to keep these details until that period has passed.
- I can move records between my own 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 via 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:

Information Commissioner's Office

Wycliffe House

Water lane, Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

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