

**Chryssie Burgess
Sole Trader
Health Balance
Established 1987**

Privacy Policy / Fair Processing Notice

As the GDPR rules themselves evolve, I may need to make changes to this information. I will always inform you if I need to make changes, and send you a copy of the new document.

PRIVACY

All information you share with me, whether recorded in written format or not, is considered **PRIVATE AND CONFIDENTIAL**, and will not be shared with any other person or organisation, except in the legal circumstances detailed below.

COMPLAINTS

Please inform me if you think there is a problem with the way I am collecting or handling your data. I will consider your complaint and if necessary take action to resolve it as soon as possible.

If you are not happy with how I am dealing with this issue, you have the right to complain to the Information Commissioner's Office (ICO)

LAWFUL BASIS FOR PROCESSING PERSONAL DATA

The information I gather about you falls within two Lawful Basis:

Legitimate Interest:

The medical and health related information I record at your initial consultation, at each appointment after that and from any other communication you voluntarily make with me, whether recorded in written format or not, comes under the legitimate interests of my business as a professionally qualified complementary therapist. This is explained in more detail under '*What kind of data I keep and why*'

Consent:

Any other personal information you choose to share with me helps me build a picture of your home, leisure and work routines which helps me support you with the wider range of services I offer; for example

- personalised therapeutic Aromatherapy blends for use in between treatment s
- digital information, handouts or books on specific health issues or particular types of activity (such as relaxation or breathing techniques) relevant to your treatment programme

This is explained in more detail under '*What kind of data I keep and why*'

WHERE I GET MY DATA FROM

- None of my data is bought in from third parties.
- I don't use any form of website tracking
- I have your details because you have given them to me at an event, during a consultation/treatment, when purchasing products or when expressing an interest in my services in general via any communication means
- If you as client/customer feel my services are relevant to the needs of someone else you know, I will not collect their details from you. I will ask you to give them my details for them to make direct contact with me

WHAT KIND OF DATA I KEEP AND WHY

Your rights with regard to this information

- I work as a multi-disciplinary complementary therapist. As such it is a requirement of my professional membership and insurance (see below) to keep and update full and accurate records of your
 - personal contact details
 - medical history
 - current medical conditions and/or investigations
 - current main health practitioner(s) (e.g. doctor, specialist, herbalist)
 - current allopathic/complementary treatments
 - current medication/recommended remedies you are using
 - plus
 - any other medical or health related information you feel I should know to assist me in providing the most effective, safe and personalised service I can.

This information is gathered under the Lawful Basis of LEGITIMATE INTEREST

Your Rights

You can refuse to give me any of this information.

However, if this means I cannot work with you in a safe and effective manner within the guidelines of my Professional Body and my Insurers (see below) I may have to refuse to work with you as a client.

- At each appointment you have with me I make further notes relating to
 - any health changes since your last appointment
 - further stresses/injuries or improvements you tell me about
 - any noticeable changes from the treatment or consultation that day
 - any products used with you or recommended to you during the appointment

This information helps me assess the safety and effectiveness of your course of treatment

This information is gathered under the Lawful Basis of LEGITIMATE INTEREST

Your Rights

You can ask me not to make these notes.

However, your request may not be allowed under the Lawful Basis of Legitimate Interest, and may involve a legal process to determine whether or not I must carry out your request.

This is because I legally have to keep your medical/health related records up to date in order to prove I am working with you in the safest, most respectful and professional manner I can.

- I specialise in stress reducing treatments and products, rather than physical correction and manipulation. For you to benefit from the most effective and personalised support I can offer, it is helpful for me to build a picture of your
 - home, leisure and work routines.

This information is gathered under the Lawful Basis of CONSENT

Your Rights

You can refuse to give me any of this type of information.

However, this would mean I can support you in a limited way with physical massage only, without any additional support for improving/managing habits that are potentially creating the physical stress in the first place. This may lead to one or two short-term treatments of specific areas potentially without any long term improvement or recovery. I do not work with clients on a long term basis in this way.

I may, however, with your consent, be able to recommend to you another/other qualified and reputable practitioner(s) within the field of complementary/alternative medicine who do work in this way.

If you are happy to share this type of information with me you can ask me not to make a written record of it and I will not.

You can also ask me to delete any digital communications you have sent to me to share this information

and I will do so **BUT ONLY AFTER** adding any new medical or health related information to your client record notes with the date the communication was received. See the following section to learn why.

WHY I KEEP YOUR MEDICAL INFORMATION AND APPOINTMENT NOTES

As a member of

- IFPA (The International Federation of Professional Aromatherapists) and
- under my insurance policy (Balens Health Professionals Policy underwritten by Zurich Insurance plc)

I am legally advised to keep all client consultation and treatment information and records for a minimum period of 7 years.

The wording in my policy states:

The records shall be kept for at least 7 years following the last occasion on which treatment was given. In the case of treatments to minors, it is advisable that records should be kept for at least 7 years after they reach the age of majority (18).

Record Keeping - Condition 14c, on page 35

I keep these records for a period of 7 years following your last treatment with me, after which they are disposed of in a safe and secure manner which respects confidentiality.

WHAT I WON'T DO WITH ANY OF YOUR INFORMATION

by any communication means

- send anything unrelated to my services or products, unless you have expressly requested me to do so
- share, show, send or sell any of your information to a third party.
The only exception to this is if I am required legally to surrender certain details to relevant authorities such as police, doctor, court of law, social services e.g should you become ill whilst in my presence and I have to call for an ambulance
- share any of your personal or medical details with another practitioner, whether within a joint Practice or not. If you ask me to recommend a practitioner to you for a specific treatment I do not offer myself, I will not give them any of your details, personal or medical. I will instead give you their details for you to contact them directly.

YOUR RIGHTS WITH REGARD TO DATA I HOLD ABOUT YOU

- You have the right to see what personal information I hold about you. I will provide this within 1 month of your request.
For paper information I will provide photocopies in a sealed envelope marked PRIVATE AND CONFIDENTIAL.
For digital information I may provide paper photocopies as above, or send it to you by any suitable safe and secure digital means.
- You have the right to have any inaccurate or incomplete data amended

- You have the right to have personal data erased/deleted
I must do this within one month of your request.
However, I may not be able to erase/delete all the information I hold about you
(See 'Why I keep your medical information and appointment notes')
- **You can unsubscribe to my services at any time**
by letting me know you wish to do so.
I will confirm when I have done so.
I will then be unable to contact you again.

HOW I USE YOUR DATA

I use your personal information to help me provide the most safe, effective and personalised service I can in the ways described in this document.

I also use some personal information (e.g. where you work, how you heard of my services, what your treatment/product preferences are) to help me monitor the effectiveness of my business and make decisions about expansion or change within it. For example:

- If you are a client using my Complementary Therapy services I may use *your main occupation* to help me monitor how well I am reaching certain groups of clients (e.g. general public, students, staff at the university), at which of my Practices and for which treatments. This information helps me improve and broaden my services to reach a wider range of customers, and shows me where change may be needed.
- If you are a client/customer using my Complementary Therapy services, and also using Aromatherapy or other products purchased from me as part of your treatment programme, or as a general consumer, I may transfer details of *your name, what you bought, when and how much it cost* to a computer spreadsheet. I use this information to show me:
 - When you may need a replacement product. This helps me make sure I have enough of the right base ingredients and essential oils in stock to produce it for you.
 - When you have benefitted from a discount or special offer. You may be due another one at your next purchase.
 - What type of other product(s) you have shown interest in. This helps me keep you informed about similar products I am stocking/producing **BUT ONLY IF you have given me MORE INFO opt-in consent to contact you.**

STORAGE OF DATA

- I keep personal contact details on the Gmail Contacts part of my email account, password secured. Also on the paper consultation and medical forms securely filed
- I keep only your name and mobile number on my mobile phone
- I do not keep any client records of a health related or medical basis on computer or on mobile phone
- These records are all paper based and are kept in a secure paper filing system to which only I have access
- Client notes needed at appointments are all kept in a wallet folder, clearly marked **PRIVATE AND CONFIDENTIAL**. The notes are kept with me at all times, and are never left in the room while another client is in there alone.