



CLINICAL HYPNOTHERAPY

Sussex Virtual Office 49 Station Rd Polegate East Sussex BN26 6EA

## PRIVACY POLICY

Your privacy is important to us. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information through the business and while you browse or use this website. If you do not agree to the following policy you may wish to cease viewing / using this website, and or refrain from submitting your personal data to us. This Policy may be updated to reflect legislative change and you will be informed of the changes made.

This privacy policy notice is served by mindAbility clinical Hypnotherapy, Sussex Virtual Office, 49 Station Rd Polegate, East Sussex, BN26 6EA and under the website [www.mindability-hypnotherapy.co.uk](http://www.mindability-hypnotherapy.co.uk).

I am a sole trader and it is my responsibility to collect and to process the data. I am registered with the ICO under the Data Protection Register, the registration number is: **ZA480875**.

I am the registered Data Protection Officer as required by the The General Data Protection Regulations (GDPR).

### Collection of data:

When you contact me via phone, the website or my message, I collect the following information about you:

- Name, address and contact details
- Any other information that you think is pertinent to know

I will use this information to contact you to establish how mindAbility can assist you. If you decided to book an initial consultation, the following information is gathered at the appointment:

- Significant relationships
- Occupation/ hobbies
- Medical history relevant to the appointments including medication
- GP and any other medical professionals involved in your care (hypnotherapy is contraindicated for certain conditions). They can be contacted if you consent to co-ordinated approach.
- Objectives of hypnotherapy
- Any other information you believe is relevant

You will also be asked about your preference regarding marketing/promotions/newsletters. If you do not wish to receive any communication, you will be asked to tick a box to reflect this. If you have agreed to receive such communication, you retain the right to withdraw your consent by the clicking unsubscribe link at the bottom of the email.

Written communication to third parties (i.e. GP or other medical professionals) will be retained.

During subsequent appointments, brief notes to assist with session planning and goal setting will be taken.

## Statistical Data collection:

We use Google Analytics to analyse how visitors use and visit the website. The data collected provides statistical information about browsing behaviours, operating systems but will not identify individuals.

## Cookies

Cookies are small file which asks for permission to be placed on your computer hard drive in order to analyse the traffic to our website, specifically pages and potential areas of interest. We use cookies on our website to provide you with a better user experience. Some cookies are required to enjoy and use the full functionality of the website. Your web browser should provide you with the controls to manage and delete cookies from your device (please see your web browser options).

## Links to other websites:

The website may contain links to other websites of interest. If you chose to click on the links, you are leaving the mindAbility website. I do not control and therefore cannot be held responsibility for the privacy of your information if you chose to share information on these sites. You are advised to review the privacy policy when entering other websites as I do not govern their practices or relevant policy.

## Client Rights:

The GDPR identifies the following individual rights:

- To know what information is held about you and the measures taken to protect your privacy
- To access your information (Written request to be sent to [asha@mindability-hypnotherapy.co.uk](mailto:asha@mindability-hypnotherapy.co.uk). The initial access is free and subsequent access will be charged at the hourly appointment rate)
- To amend or rectify information if recorded inaccurately
- To withdraw your consent to use your personal information
- To identify specific contexts where you do not wish to receive communication
- To provide permission to transfer your information to a third party
- To erase your personal data (There is a legal obligation to hold records for a minimum of 7 years and will be securely destroyed after this)
- To use the data provided for the stated purpose only. If it is my professional opinion that there is an immediate risk of harm presented to you or to others by not disclosing information, the 'greater good' rule will be applied, and confidentiality will no longer be paramount. In these instances, I may be required to contact your GP other appropriate third parties. Only information to ensure your safety or that of others will be shared. Data can be disclosed without your consent for the prevention or detection of a crime.
- Not to be subjected to automated-decision making including profiling. I will not to be using your information for profiling.

## Storage of Data:

Information is received at mindAbility in many forms including but not limited to text messages, via the website, in person, social media, voicemail and email.

The personal data is then secured using the following mechanisms:

- Written data is stored in a secure locked storage unit.
- Electronic information is stored on password protected devices (including business phone and laptop).
- If you have agreed to participate in CORP research programme, data is anonymised prior to be entered onto a specialist software package linked to the database.
- All social media accounts including Facebook are password protected and accessed via password protected devices (mobiles or laptops).
- Voicemails are linked to a business phone and is password protected

- Internet security measures

Personal data will be stored on servers within the European Economic Area (EEA). The GDPR restricts data transfers to countries outside the EEA in order to ensure that the level of data protection afforded to individuals by the GDPR is not undermined.

### **Sharing of Data:**

Your personal data will not be shared without your permission unless there is legal duty to do so. This has been outlined in Client's Rights section.

Your data maybe shared with service providers in order to complete administrative tasks such as sending you appointment reminder message via social media platform or to process financial transaction. These services will have access to limited relevant information to provide the required service on the company's behalf. They are not entitled to use the information for any other purpose.

The Code of Conduct as set out by the Association for Solution Focused Hypnotherapists (AfSFH) requires regular supervision, this includes case discussion. This does not require disclosure of names and therefore individual identities remain protected.

Your information will remain confidential unless you have given explicit permission to share (with the exceptions identified above).

Clients under the age of 16 are entitled to privacy, please refer to the guidance note in relation to working with young people.

### **Legal basis for processing the data**

- There is consent of the data subject from the online opt-in
- Legitimate reasons where individuals are seeking therapy and is necessary to carry out the task
- Legal obligation where insurance and governing bodies require personal data to be held for a minimum period.

### **Data Breaches:**

Where a data breach occurs and results in the potential risk to the individual's rights and freedoms including but not limited to financial loss, loss of confidence, damage to reputation or any other social or economic disadvantage, the ICO and the individuals will be informed within 72 hours. All other breaches will be reviewed internally and recorded and held indefinitely.

If you have any questions, please contact the Data Protection Officer, Asha via the 'Contact Me' page via Mindability website or by phoning 07902 580 703.