



GDPR Policy
May 18

PRIVACY NOTIFICATION

YOUR PERSONAL INFORMATION

The General Data Protection Regulation (GDPR) introduces new legal protection for personal information we hold on all European Union (EU) citizens as from 25 May 2018. This tells you what personal information we hold; why we hold this information; and what your rights are under the revised data protection regulations.

Once you have read it, and agree, please complete and sign the declaration at the bottom and return to the below address.

Organisation name: Therapies Inc Limited

Address: 33 Mount Prospect Park, Belfast BT9 7BG, Northern Ireland

Telephone No: 02890580764

Please direct any enquiries relating to GDPR:

kathy.green@therapiesinc.co.uk

Purpose of processing the Information we hold

The purpose of holding and using the information we retain on you is to complete the contractual obligations which we have entered with the Belfast Trust (hereafter referred to as the Trust) to provide to you, treatment/s referred to us by the Trust and agreed with you and the Trust. As such Therapies Inc Limited acts under the terms of the legislation primarily as a data processor for the Trust. The Trust, as the data controller has legal responsibility regarding personal information provided by clients to the Trust and referred for treatments by the Trust to Therapies Inc Limited. Therapies Inc Limited accepts its responsibility as a data processor under GDPR for the protection of personal information disclosed to its therapists (sub-processors).

Lawful Basis for holding information

The lawful basis under which we hold and use your information is threefold; your **consent**, **contractual**, to complete contractual obligations with the Trust; and finally, **our legitimate interests**, i.e. our requirement to retain the information that you and the Trust have provided to ensure that the rights bestowed by the regulations to all stakeholders within the EU are protected as required by GDPR, without prejudice.

What information we hold and what we do with it

The information normally to be held is, contact details and any personal information which is required in order for our therapists to deliver the services we are contracted to provide under the terms of our (Therapies Inc Limited) contract with the Trust.

We will not use this information for any other purpose (except as required for our legitimate interest, as outlined above) without your prior consent.

We may retain this information for any stakeholder with the prospect that there will be future treatments and/or future contractual agreements with the Trust

How Long we keep your information for

The criteria used for determining the retention period is as follows:

1. For current clients and therapists, we keep all information which is necessary, provided by consent and contract, to fulfil our contractual obligations.
2. For previous clients and therapists, we keep all information to enable us to issue a speedy response to any queries or to ensure our legitimate interest as noted above.
3. Formal requests to remove information will normally be actioned within 24 hours, except where a case of legitimate interest must be considered by the Board of Therapies Inc Limited. A decision on this will be communicated within 72 hours of such a request.

Data Security

We are committed to ensuring that personal data is secure and have taken measures to ensure this. To prevent unauthorised access or disclosure, all stakeholders should put in place appropriate technical, physical and managerial procedures to safeguard and secure the information they hold. To that end therapists (as sub-processors) are legally responsible for ensuring that all client details, whether written or electronic are secure from casual or deliberate theft. For example, no client details should be left in a position of theft, such as in a car or other unsecure location.

YOUR RIGHTS

GDPR provides the following rights to all EU citizens:

- The right to be informed: To know how your information will be held and used (this notice).
- The right of access: To see our records of your personal information, so you know what is held about you and can verify it.
- The right to rectification: To tell us to make changes to your personal information if it is incorrect or incomplete.
- The right to erasure (also called “the right to be forgotten”): For you to request us to erase any information we hold about you if you ask them not to hold it anymore

- The right to restrict processing of personal data: You have the right to request limits on how we use your personal information
- The right to data portability: under certain circumstances you can request a copy of personal information held electronically so you can reuse it in other systems.
- The right to object: To be able to tell us you don't want them to use certain parts of your information, or only to use it for certain purposes.
- Rights in relation to automated decision-making and profiling.
- The right to lodge a complaint with the Information Commissioner's Office: To be able to complain to the ICO if you feel your details are not correct, if they are not being used in a way that you have given permission for, or if they are being stored when they don't have to be.

Full details of your rights can be found at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

THERAPISTS

Please note:

- If you don't agree to us keeping records of information about you, then we may not be able to have any future contractual relationship with you or answer any queries you may have at some point in the future.
- We must keep your records for a certain period as described above, which may mean that even if you ask us to erase any details about you, we might have to keep these details until after that period has passed to protect our legitimate interest.
- We can move records between our computers and IT systems, providing that your details are protected from being seen by others without your permission.

DECLARATION

Please tick yes to acknowledge that you have read and understood the information above and agree to Therapies Inc Limited holding your personal information and using it to provide the best possible treatments, services and support, in line with the lawful basis as defined above, and to be able to answer any future queries.

I agree to GDPR Privacy Notice as outlined above:

- Yes
 No

Signature:.....