

## **GDPR Privacy Notice**

### **INFORMATION**

The GDPR (General Data Protection Regulation) of 25 May 2018 is the legal regulation that has been put in place to safeguard an individual's personal information. The GDPR is an EU-wide directive that all UK businesses need to be compliant with. The following privacy policy details the lawful basis for BTM to hold information, the type of information that BTM holds about its clients, why that information is required, who it is shared with, how that information is used and protected and details the rights an individual has in terms of access to that information or, requests for information held to be amended or deleted.

### **WHY THE INFORMATION IS REQUIRED**

The lawful basis by which BTM holds this information is held under Special Category Data: Health.

In order to provide an effective and safe massage therapy treatment, BTM requires information about your current health and your medical history.

This information is used only to provide you with the best possible course of treatment and advice.

BTM also requires your contact details to arrange appointment times with you.

### **WHAT INFORMATION DOES BTM COLLECT ABOUT YOU**

BTM collects information about you when you first contact us to use our services (whether by telephone, email or through our website enquiry form at [WWW.BEYONDTHEMATS.CO.UK](http://WWW.BEYONDTHEMATS.CO.UK)) and upon your first visit for treatment when you complete the client intake form.

Upon signing the client intake form on your first treatment at BTM you are agreeing that BTM will keep your details confidential and abide by current GDPR guidelines. You also agree that BTM can contact you via telephone, text message and email regarding your appointments and treatments with us. This also includes the occasional marketing/promotional update of our products, services and availability. An option to unsubscribe is always included if you would no longer like us to contact you.

Personal data is collected such as:

- Name
- Date of birth
- Address
- Email address
- Telephone number
- Occupation
- Emergency contact or next of kin details
- Health conditions including allergies, medication and doses, history of; injuries, operations, illnesses provided on the client intake form and discussed during the first and subsequent treatments
- GP surgery details and other body treatments currently and previously received
- Lifestyle covering an overview of: exercise, diet, sleep and stress levels
- Information on current physical state (i.e. aches/pains/tension)
- Treatment detail and assessment notes which will be recorded after each massage session
- Diarised records of appointment times

If you object to the collection and use of your personal data we may be unable to provide you with our services.

### **HOW WILL WE USE THE INFORMATION GATHERED**

BTM requires this information to assess your massage treatment requirements and provide you with a safe and effective massage therapy. Additionally the information is used to refer to at subsequent treatments in order to assess levels of improvement.

The information may be shared with another Therapist or with another health practitioner should you be referred to one of these by BTM. This will only be done with your consent. Your information will not be shared with anyone else (other than required for legal process) without explaining the reason why this is necessary and obtaining your explicit consent. The contact information you provide may be used by BTM to contact you in relation to appointment times or dialogue regarding your treatment plan.

### **HOW LONG IS THE INFORMATION HELD FOR**

BTM is required to keep your information for a period of 7 years after your last treatment for insurance purposes. Your data will not be transferred without your consent.

Once every two years, BTM will review all client records and destroy any records that are no longer bound by the regulated legal timescale for such records to be held.

### **SECURITY POLICY**

BTM is committed to ensuring that your information is secure.

In order to prevent unauthorised access or disclosure, suitable physical, electronic and managerial procedures have been put in place to safeguard and secure the information that is collected both online and on paper.

The health and personal information gathered is held on paper Client Intake forms and paper treatment notes and is stored securely in a locked filing cabinet in a locked therapy studio. None of this information other than your name, phone number and/or email address is held electronically. Due to the nature of our business BTM retains paper based personal information and as such, has a duty to ensure that it is disposed of in a secure, confidential and compliant manner.

Contact details including telephone numbers and email addresses are held on a password protected telephone and personal computer.

## **DATA BREACH**

A back up document is held of client names and contact details (name, email and telephone number).

In the event of a data breach which consists of a breach of security leading to destruction, loss, alteration, unauthorised disclosure of or access to personal data, BTM understands ICO have to be notified where it is likely to result in a risk to the rights and freedoms of individuals. In the event of such a breach, BTM will notify those concerned directly and without delay. Records of personal data breaches will be maintained in any case.

## **Your individual RIGHTS**

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The right to be informed about the personal data being processed;
- The right of access to your personal data;
- The right to rectification if there is something incorrect or incomplete;
- The right to erasure of your personal data;
- The right to limit how the information is used or shared;
- The right to portability. Under certain circumstances a copy of electronically held information can be requested so it can be reused in other systems;
- The right to object if there are certain parts of an individual's information that they do not want used or to be used only for certain purposes
- Rights in relation to automated decision-making and profiling;
- The right to lodge a complaint with the Information Commissioner's Office. An individual can complain to the ICO if the individual feels the information held is incorrect or not being used in the permission was granted or if information is being held unnecessarily. Full details of individual's rights can be held at:  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

## **COMPLAINTS**

If you are dissatisfied with any aspect of the way in which we process your personal data please contact BTM at the above address. You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

## **ADDITIONAL NOTES**

If an individual does not agree to BTM keeping records of information about an individual and treatment records then it may not be possible to provide the therapy.

Additionally, massage therapists have to keep records of treatment for a specific period of time as described above which may mean that even if you ask for information to be erased, they might be bound to keep these details until the period has elapsed.