



## Privacy Statement

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This privacy statement describes how Heal.Feel.Connect. protects and makes use of the information you provide, in compliance with current data protection laws. If you provide, or are asked to provide, information when contacting Heal.Feel.Connect., it will only be used in the ways described in this privacy statement.

This statement is updated from time to time. This latest version was updated on 3<sup>rd</sup> January 2019. If you have any questions about this policy, please email HealFeelConnect@gmail.com.

### What personal information will be collected by Heal.Feel.Connect?

- Your name, address, telephone number, email address, date of birth and GP name and practice. **Please note:** Should any personal data be subject to change (e.g. if you move house, change GPs, change your name etc.) during your active involvement with Heal.Feel.Connect., you should notify the therapist at the earliest convenience so that your records are kept up to date.
- The therapist will keep written notes of any one-to-one sessions (including telephone or face-to-face sessions) with you. These notes will contain a significant amount of personal data relevant to your wellbeing, concerns and learning/development over the course of therapy.
- At times, the therapist may also have written emails sent by you.
- In some circumstances you may complete questionnaires related to your wellbeing.
- Occasionally, during Mindfulness groups, the therapist will audio record group sessions and your voice may be present on these recordings. No video recording will ever be used. The instructor will inform you when audio recording is taking place. No other personal data you provide will be linked to these recordings (e.g. your name and contact details).

### Why is this data being collected?

- Your name, address, telephone number, email address is collected so that the therapist can make contact with you for the duration of your involvement with Heal.Feel.Connect.
- Your date of birth and GP details are collected as the therapist has a duty of care as a health professional to contact your GP/relevant third party professionals 1) if you are taken ill during a session and require urgent medical care and 2) if it is felt that you may require additional support from your GP (or relevant third party professional) because of concern about you being at risk of harm in some way. If the therapist feels contacting your GP or another professional is necessary, then all possible efforts will be made to involve you in this decision.
- Notes are kept following one-to-one sessions to allow the therapist to deliver their services effectively, allowing a continuity of care between sessions and a way to record progress toward your goals.
- Written emails are stored to serve as a reminder to the therapist of any previous conversations had between yourself and the therapist which may be relevant to future contact.
- Questionnaires are completed to assess your wellbeing and guide the therapist work with you. They are also used to monitor change in your wellbeing over time (e.g. between the start and end of your group or course of one-to-one sessions). Occasionally you may also be asked to complete questionnaires to give your feedback on the services you received. This information is used to guide future improvements to how Heal.Feel.Connect. delivers its services.
- Audio recordings are occasionally collected to allow the therapist to take examples of their work to supervision – supervision involves the therapist discussing their teaching methods and therapeutic techniques with another trained clinical psychologist or mindfulness teacher in order to improve their skills. Your personally identifiable information will not be discussed in supervision (i.e. the supervisor will not be told your name, address, telephone number, email address, date of birth or GP details and will not be shown any more detailed notes made by the therapist relating to one-to-one sessions).



#### How will your data be stored?

- Any personal information held about you is stored and processed in line with The Data Protection Act 1998 (in force on the date this statement became operational) and the General Data Protection Regulation (Regulation (EU) 2016/679) adopted on 27th April 2016 and enforceable from 25th May 2018.
- All data will be stored for a minimum of five years (and a maximum of 10 years) following the end of your active involvement with Heal.Feel.Connect. (in line with guidelines published by the General Medical Council). Heal.Feel.Connect. has the right to retain your data for the minimum period so that it can respond effectively to any questions or complaints that may later be raised by you and/or your representatives.
- All electronic data will be stored on a password protected computer in a locked building.
- All paper-based data these will be stored in a locked cabinet, in a locked building.
- Audio recordings will be temporality stored on a Dictaphone/voice recorder before being transferred to a password protected computer and stored in a locked building (within 2 hours).
- All email conversations will be stored online in a password protected email account.
- In the unlikely event of a data breach, we will notify the Information Commissioner's Office (ICO) so that their procedures can be followed. We will also notify all individuals whose data may have been accessed to alert them to the breach and any potential risks.

#### Do you need to give consent for your data to be stored by Heal.Feel.Connect.?

- Heal.Feel.Connect. does not legally require your consent to store the data listed above and to process this data in the ways described in this statement.
- While you are actively using the services provided by Heal.Feel.Connect. your consent to being contacted about these services is assumed.
- You will be asked to provide consent for your contact details (name/address/telephone number and email address) to be held on a mailing list for the purpose of receiving news and updates about future courses, workshops and promotions run by Heal.Feel.Connect. Your data will never be passed to any third-party company for the purposes of marketing.

#### Disclosure of data

- Every effort will be made by Heal.Feel.Connect. to keep your data confidential. However, in certain circumstances the Data Protection Act allows Heal.Feel.Connect. to disclose data (including sensitive data) without the data subject's consent (e.g. as part of any legal proceedings or if there is a concern about any member of the public being at risk or harm). If your data is disclosed then Heal.Feel.Connect. will take all reasonable steps to notify you about the disclosure and will also ensure that any data request from a third party is legitimate, reasonable and necessary.

#### Your rights

- You have the right to:
  - 1) ask what information the company holds about you and why;
  - 2) ask how to gain access to information held about you;
  - 3) be informed how to keep your information up to date;
  - 4) ask for your data to be destroyed after the minimum retention period of 5 years, but not before then;
  - 5) be informed how the company is meeting its data protection obligations.
- You have the right to request access to any personally identifiable data stored by Heal.Feel.Connect. without giving a reason. If you would like to request a copy of the data held about you, this is called a subject access request. Subject access requests should be made in writing on email to HealFeelConnect@gmail.com. Heal.Feel.Connect. will aim to provide the relevant data within 30 days and will always verify the identity of anyone making a subject access request before handing over any information.