RCNS Privacy Policy

This policy explains how Rowley Clinical Neuropsychology Services Limited (RCNS Ltd) collects, uses, stores and shares personal information, including confidential health information. It covers information we hold about our Associates, our customers and our customers' clients, and sets out the legal basis for processing and sharing it.

1. Definitions

For the purpose of this policy the following definitions apply:

- **RCNS Ltd** means Rowley Clinical Neuropsychology Services Limited, registered in England and Wales with Companies House under company number 13832672.
- **Company head office** means Rowley Clinical Neuropsychology Services Limited, International House, 14 King Street, Leeds, England, LS1 2HL.
- **Associates** means qualified clinical psychologists who provide psychology services on a case and who are legally separate trading entities (self-employed sole traders or limited companies) appointed by RCNS Ltd.
- **UK GDPR** means the retained version of the General Data Protection Regulation (EU) 2016/679 as it forms part of UK law.
- **DPA 2018** means the Data Protection Act 2018, as amended (including by the Data (Use and Access) Act 2025).
- **ICO** means the Information Commissioner's Office, the UK data protection regulator.
- **Data subject** means the individual whom particular personal data is about.
- **Data controller** means the person or organisation that, alone or jointly with others, decides the purposes and means of processing personal data.
- **Data processor** means a person or organisation that processes personal data on behalf of a data controller.
- **Processing** means any operation carried out on information or data, including obtaining, recording, holding, sharing and deleting it.
- **Client** means the individual named as the data subject whom the report or psychology service relates to.
- **Customer** means the entity that has commissioned the report and/or psychology services concerning the client and has full legal authority to do so.
- **DPIA** means data protection impact assessment.
- **Breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, whether accidental or deliberate.
- **Individual rights** means the rights individuals have under the UK GDPR, set out in section 14.
- **Personal data** means any information relating to an identified or identifiable person, as defined by the UK GDPR.
- **Special category data** means the data described in Article 9 of the UK GDPR, which includes health, racial or ethnic origin and religious belief. Criminal offence data (Article 10) is treated with the same care.

2. Acknowledgements

RCNS Ltd recognises all rights and responsibilities under the UK GDPR and the DPA 2018.

3. Privacy statement

RCNS Ltd respects privacy and will only use information shared with us for the specified and lawful purposes set out in the UK GDPR. We will use and process your information responsibly and will take appropriate organisational and technical measures to protect it from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Where there is a lawful basis and it is necessary for the purpose the information was collected, RCNS Ltd will share personal and special category data with the data controller, the client, the case manager, relevant clinical professionals, the instructing solicitor, an appointed deputy and family members.

RCNS Ltd will not share information for any purpose other than the specific purpose it was shared with us. What is shared, and with whom, is detailed in sections 6 to 8 of this policy.

RCNS Ltd will not share personal information with any third party for the purpose of marketing, advertising or statistical analysis.

4. Data processing

In the course of providing services, RCNS Ltd may process the following personal information:

- Associate personal information
- Customer personal information
- Client personal information and medical records
- Website visitor information (see section 13)

This policy covers information in any form, including but not limited to:

- Emails
- Letters
- Medical records
- Text messages
- Instant messages
- Application forms
- Certificates
- Photographs
- Medical scans

5. Data protection impact assessments

RCNS Ltd has carried out a data protection impact assessment (DPIA) for the processing of client information, and reviews it when the way we process that information changes.

6. Associates' personal information

6.1 Lawful basis for processing. Where personal information is collected about Associates, RCNS Ltd is the data controller. Our lawful bases are the performance of the contract between RCNS Ltd and the Associate, compliance with legal obligations such as tax and accounting records, and our legitimate interest in confirming that Associates are properly registered, qualified and insured to provide services to our customers. Associates' information is processed to provide services to RCNS Ltd's customers and to process invoices and payments.

6.2 Data collected. The following is an example of the data collected and processed about Associates:

- Name, address, email address and contact telephone numbers
- Company contacts, including job role
- VAT number and company registration number
- Bank account information
- Health and Care Professions Council (HCPC) registration, qualifications and membership of professional bodies
- Insurance information
- Information Commissioner's Office (ICO) registration
- Work experience

6.3 Data sharing. Within the limits of the lawful bases above, RCNS Ltd may share the following information:

- Name, address and contact information may be shared with customers.
- Accounting information may be shared with His Majesty's Revenue and Customs (HMRC) in accordance with normal accounting practice.
- Limited information may be shared with RCNS Ltd's accountants and auditors, only when absolutely necessary.

6.4 Retention. Associates' information is retained for as long as the Associate is registered with RCNS Ltd and available to provide services, and then for 10 years.

7. Customer personal information

7.1 Lawful basis for processing. Where personal information is collected about customers, RCNS Ltd is the data controller. Our lawful bases are the performance of the contract between RCNS Ltd and the customer, and compliance with legal obligations such as tax and accounting records. Customer information is processed to provide services to the customer and to process invoices and payments.

7.2 Data collected. The following is an example of the data collected and processed about customers:

- Name, address, email address and contact telephone numbers
- Company contacts, including job role
- VAT number and company registration number
- Bank account information

7.3 Data sharing. Within the limits of the lawful bases above, RCNS Ltd may share the following information:

- Name, address and contact information may be shared with Associates.
- Accounting information may be shared with HMRC in accordance with normal accounting practice.
- Limited information may be shared with RCNS Ltd's accountants and auditors, only when absolutely necessary.

7.4 Retention. Customer information is retained for as long as RCNS Ltd is the psychology services company to the customer, and then for 10 years, subject to the following alternative retention periods:

- If the customer's client is under 18, the 10 years begin the day after the client turns 18, provided RCNS Ltd is no longer providing psychology services to the customer regarding that client.
- If the customer's client lacks mental capacity, records are retained for 50 years after RCNS Ltd stops providing services to the customer regarding that client.

8. Client personal information

8.1 Lawful basis for processing. Where personal information is collected about customers' clients, RCNS Ltd is the data processor. We process personal and special category data only on the customer's documented instructions, under the contract between RCNS Ltd and the customer and the RCNS Ltd Customer Data Processing & Sharing Agreement. The customer, as data controller, is responsible for the lawful basis and the Article 9 condition for processing. Client information is processed to provide psychology services to the customer and to process invoices and payments.

8.2 Data collected. The following is an example of the data collected and processed about clients:

- Name, address, email address and contact telephone numbers
- Age, gender, race and religious background
- Medical records, doctors' notes and treatment records
- Criminal history
- Personal contact information of family members and support workers
- Legal representatives
- Any additional information relevant to managing risk and providing psychology services to the customer

8.3 Data sharing. Within the limits of the lawful basis above, RCNS Ltd may share the following information:

- Client data may be shared with RCNS Ltd's nominated Associate for the provision of services to the client.
- Only personal and special category data deemed absolutely necessary will be shared with the appointed Associate.

8.4 Retention. Client information is retained for as long as RCNS Ltd is the psychology services company to the customer, and then for 10 years, subject to the following alternative retention periods:

- If the customer's client is under 18, the 10 years begin the day after the client turns 18, provided RCNS Ltd is no longer providing psychology services to the customer regarding that client.

- If the customer's client lacks mental capacity, records are retained for 50 years after RCNS Ltd stops providing services to the customer regarding that client.

9. Transfers of personal information outside the UK

In line with the UK GDPR, RCNS Ltd will not transfer personal or special category data outside the UK, either directly or through a third party, unless the destination is covered by UK adequacy regulations or appropriate safeguards are in place (for example the ICO's International Data Transfer Agreement or Addendum).

Where data is processed by a third-party system or service, RCNS Ltd requires that the service complies with the UK GDPR and that information is stored in data centres in the UK or the European Economic Area.

Where a client lives outside the UK, RCNS Ltd will take any steps required by the laws of the client's country of residence when processing their personal information.

10. Information retention

Personal and special category data is retained only for as long as necessary for the lawful basis for processing, in line with the RCNS Ltd retention policy and as detailed in sections 6 to 8 of this policy. RCNS Ltd must retain records to comply with insurance and indemnity policies and may refuse a request to destroy client personal information made before the relevant retention period has expired.

Where RCNS Ltd stops providing services to a customer or client and retains data under sections 6 to 8, it will respect the data subject's privacy at all times. Three months after services to the client or customer finish, retained records are moved into a secure archive with extremely limited access. No one involved in day-to-day operations has access to archived records.

Financial information relating to any transaction is retained for a minimum of six years from the end of the financial year in which the transaction was completed, in line with HMRC guidelines.

In some circumstances it may not be possible to destroy a limited amount of personal and special category data when the retention period expires. This includes backups of electronic documents and email communications that are securely archived. Such material is deleted when the opportunity arises.

11. Data access and security

Access to personal and special category data processed by RCNS Ltd is granted on a "least privilege" basis. Only people with a specific need to perform a function vital to the lawful basis for processing are given access.

Access to personal and special category data is reviewed and audited regularly.

All electronic data is backed up securely for disaster recovery and data loss prevention. Access to backup systems is restricted to the people responsible for supporting the IT infrastructure.

12. Personal data breaches

Where RCNS Ltd is the data controller and a breach occurs, we will investigate immediately. Unless the breach is unlikely to result in a risk to individuals, we will report it to the ICO without undue delay and no later than 72 hours after becoming aware of it. Where the breach is likely to result in a high risk to individuals, we will also tell them without undue delay.

Where RCNS Ltd is the data processor and a breach occurs, we will investigate immediately and report it to the relevant data controller without undue delay and within 12 hours.

A record of every personal data breach is retained indefinitely.

13. Website cookies

The RCNS Ltd website uses cookies. A cookie is a small file of letters and numbers sent to and stored on your device so that standard internet log information and visitor behaviour information can be collected in an anonymous form.

The cookies used are analytical cookies. They count the number of visitors and show how visitors move around the site, which helps us improve the way the website works, for example by making sure people can find what they need easily. Similar information about site usage is gathered from web server log files. You can block or delete cookies through your browser settings.

RCNS Ltd does not use cookies or log files to identify individuals personally, and information gained from cookies is not shared with any third party.

The website tells visitors about its use of cookies on the home page and links to this privacy policy.

14. Individual rights

RCNS Ltd responds to every request under this section free of charge and within one month of receiving it. For complex or numerous requests we may extend this by up to two further months, and we will tell you if we do. Where RCNS Ltd is the data processor for your information, we will pass your request to the relevant data controller and help them respond.

14.1 The right to be informed. RCNS Ltd will give each data subject a link to this privacy policy before we start processing their personal information.

14.2 The right of access. You may ask for a copy of the personal and special category data RCNS Ltd processes about you or, for a client, a lawfully appointed representative may ask on their behalf.

14.3 The right to rectification. You may ask us to correct personal or special category data that is inaccurate or incomplete, whether you are the data subject or a lawfully appointed representative of a client.

14.4 The right to erasure. RCNS Ltd will consider every request case by case. A request may be refused only where significant legal or technical reasons prevent records being destroyed, for example the retention periods in sections 6 to 8. Where records are not deleted, we will consider restricting processing as an alternative.

14.5 The right to restrict processing. RCNS Ltd will consider every request case by case. A request may be refused only where significant legal or technical reasons prevent it.

14.6 The right to data portability. RCNS Ltd recognises this right and will cooperate with the relevant data controller as required.

14.7 The right to object. You may object to processing that relies on our legitimate interests (section 6.1). The right does not apply where processing is necessary for a contract or to meet a legal obligation.

14.8 Rights in relation to automated decision-making and profiling. RCNS Ltd does not carry out profiling and does not rely on automated decision-making.

14.9 The right to complain. If you are unhappy with how we have handled your information, please contact us first (see section 15). You can also complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

15. Accountability and governance

15.1 RCNS Ltd has implemented the following data protection policies:

- RCNS Ltd Privacy Policy
- RCNS Ltd Information Sharing Agreement
- RCNS Ltd Breach and GDPR Rights Policy

15.2 All policies relating to the processing of personal and special category data are reviewed annually.

15.3 RCNS Ltd is registered with the ICO under registration reference ZA767753.

Any concerns about data protection, privacy or information governance can be reported in confidence to contact@rcns.co.uk.

16. Third-party services used by RCNS Ltd

These are the privacy policies of the third-party services RCNS Ltd uses:

- Microsoft 365
- GoDaddy (website hosting)

17. Policy review

This policy is reviewed annually and updated as needed. Last reviewed: 29 October 2026.