



**Kathleen Jordan**  
**Complementary Therapies**

**GENERAL DATA PROTECTION REGULATION (GDPR)**  
**DATA PROTECTION POLICY & CONSENT NOTICE**

Under the General Data Protection Regulation (GDPR), and as from May 2018, I need to explain to you what personal information I hold in relation to the treatments I provide for you, why I need it and for how long. If you have any questions relating to this, please do not hesitate to contact me.

**1. My details as the person holding your Personal Information**

**Name:** Kathleen Jordan (*trading as Kathleen Jordan Complementary Therapies*)  
**Nature of Business:** Complementary Therapies  
**Email:** [kjordan98a@hotmail.com](mailto:kjordan98a@hotmail.com)  
**Mobile:** 07521 726701

**2. Why I need to process client information**

In order to give professional complementary therapy treatments, I will need to gather and retain potentially sensitive information about your health. I will only use this information to ascertain if the treatments I provide are suitable for you and any other recommendations I think suitable concerning aspects of health and wellbeing. All of the information I gather and retain is kept on paper records and stored securely.

**3. Why I need to hold and use client information**

As a member of the Association of Reflexologists (AoR) and the Federation of Holistic Therapists (FHT), I abide by their Codes of Conduct. The lawful basis under which I hold and use your information is **my legitimate interests** ie. my requirement to retain the information in order to provide you with the best possible treatment options and advice.

As I hold special category data (i.e. health related information), the **Additional Condition** under which I hold and use this information is: for me to fulfil my role as a health care practitioner bound under the AoR and FHT Confidentiality as defined in their Codes of Practice and Ethics.

**4. What information I hold and what I do with it**

In order to give professional complementary therapy treatments, I will need to ask for and keep information about your health. I will only use this for informing complementary therapy treatments and any advice I give as a result of your treatment. The information to be held is:

- Your contact details and details of a personal emergency contact
- Medical history and other health-related information (which I will take from you at first consultation)
- Treatment details and related notes (which I will take after each consultation)

I will **NOT** share your information with anyone else (other than if necessary for legal requirements) without explaining why it is necessary, and getting your explicit consent.

**5. How Long I Retain Your Information for**

I will only keep your data for as long as necessary. I need to keep all data for claims occurring insurance for which I am required to keep my records for 7 years (for adults) after the last treatment (or, for children, records will be kept until the child is 25 or if 17 when treated, then 26 years of age).

PLEASE NOTE: Because of my legal obligations stated in point 3, I cannot delete your personal records before the times specified, however, I will destroy all records safely and securely after this point.

**6. Protecting Your Personal Data**

I may contact you, usually by text, WhatsApp or email, in relation to

**Appointments and Reminders only** in response to your initial enquiry, after which your contact preferences will be noted at our initial consultation and can be changed at any time in person or by text, WhatsApp or email.

My devices are password protected, however, I will not send out any confidential information, and I would ask that you only use email/texts in relation to complementary therapy appointments.

I DO NOT send out marketing material, other than on initial contact or if requested re information about the therapies I offer.

**7. Your Rights and Therapist's Rights**

**Your Rights:** GDPR gives you the following rights

- The right to be informed: *To know how your information will be held and used (this notice).*
- The right of access: *To see your therapist's records of your personal information, so you know what is held about you and can verify it.*
- The right to rectification: *To tell your therapist 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 your therapist to erase any information they hold about you*
- The right to restrict processing of personal data: *You have the right to request limits on how your therapist uses 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 your therapist 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/>. If you wish to exercise any of these rights, please email me at [kjordan98a@hotmail.com](mailto:kjordan98a@hotmail.com)

If you are dissatisfied with the response you can complain to the [Information Commissioner's Office](https://ico.org.uk); their contact details are at: [www.ico.org.uk](https://ico.org.uk)

### **Therapist's Rights**

Please note:

- if you don't agree to Kathleen Jordan Complementary Therapies keeping records of information about you and your treatments, or if you don't allow the use of information in the way needed for treatments, I may not be able to treat you
  - As your Complementary Therapist, I need to keep your records of treatment for a certain period as described above, which may mean that even if you ask me to erase any details about you, I may have to keep these details until after that period has passed
  - I can move my records between computers and IT systems, as long as your details are protected from being seen by others without your permission.
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