

# Claire Byrne

## Traditional Acupuncture

### PRIVACY NOTICE

This notice is to explain why I collect your personal data, and what I do with it, and to ensure I am working in accordance with the EU General Data Protection Regulation (GDPR); terms from the regulation are indicated in bold.

When you supply your personal details to me, when we communicate by email, and when I take notes in the clinic, this information is stored and processed for four reasons in line with the GDPR requirements:

1. I need to collect personal information about your health in order to diagnose and provide you with the best possible treatment. Your requesting treatment and my agreement to provide that care constitutes in law an (unwritten) **contract**.
2. I have a **legitimate interest** in collecting that information, because without it I couldn't practice acupuncture effectively and safely.
3. I keep records of your contact information because I think that it is important that I can contact you in order to confirm your appointments with me or to update you on matters related to your medical care as appropriate. This again constitutes a **legitimate interest**, but this time it is your legitimate interest.
4. Provided I have your **consent** (and this only needs to be verbal consent), I may occasionally send you individualised health information by email in the form of articles or advice. I will not send out generalised marketing unless you have explicitly provided me consent to do so. You may withdraw consent to receive emails at any time - just let me know by any convenient method. Any email or text exchanges we may have regarding your appointments, any aspect of your acupuncture care, or containing any personal data, will be deleted. Your email address is stored in my contacts, and I take all steps to ensure my data is as secure as possible.

I have a **legal obligation** to retain your records for 8 years after your most recent appointment (or after you have reached age 25, if this is longer), but after this period you can ask me to delete your records if you wish. Otherwise, I will retain your records indefinitely in order that I can provide you with the best possible care should you wish to see me at some future date. Your clinical records are stored only on paper, in individual paper files, and in a secure cabinet.

I also keep a file on my password protected computer at home which stores the invoices which I send out to those people who pay by bank transfer. These invoices

mostly record dates of acupuncture appointments and names of patents. Some record addresses of patents only if requested by the patient for the purposes of claiming clinic fees on insurance. These documents are not seen by accountants and are purely for personal financial record keeping.

I am the only person who has access to your records, invoice files and emails. I will never share your information with anyone who does not have a legal right of access without your written consent. Should you request treatment from a different practitioner who may require information from your notes, I will inform you what details have been requested and seek your consent.

I will endeavor to keep your details accurate and up to date, by following up any changes to address and telephone number, health conditions and medications. You have the right to see what personal data of yours I hold, and you can also ask me to correct any factual errors. I am legally required to respond to any request from a patient to see their personal data within a timescale of 30 days. However, I would ensure that I responded as soon as I possibly could to any reasonable request for access to personal records.

In the event that anything should happen to me which would render me unable to oversee your records, then, and only in this event, I have entrusted the handling of my clinical records to Lucy Fox, who is also an acupuncturist.

I want you to be absolutely confident that I am treating your personal data responsibly, and that I will do everything I can to make sure that the only people who can access that data have a genuine need to do so. In the case of my practice this would most likely apply in the situation of me needing to make a referral to another health professional.

Of course, if you feel that I am mishandling your personal data in some way, you have the right to complain. Please first raise your concern with me, as I hope very much I will be able deal with any concerns you might have. However, you can also raise a concern directly with the Information Commissioner's Office on <https://ico.org.uk/concerns/>