



# Wilson Psychology

## Wilson Psychology Ltd. Privacy Policy

This is the privacy policy of Wilson Psychology Ltd. In this document, "we", "our", or "us" refer to Wilson Psychology Ltd, company number 12275622, registered in the UK. Our registered office is at 57a Commercial Road, Rothwell, LC26 0QD.

### 1. How we use your personal data

We take the privacy rights of all our clients seriously and we adopt a high standard of compliance and confidentiality when dealing with your data. We want you to understand that this is a safe place for you to discuss your feelings and concerns and we operate in a highly confidential environment. This privacy notice sets out the details of how we collect and process your personal and sensitive data when using our services.

The only data we collect from you is when you provide information to us over the telephone or during consultations. We may receive information about you from third parties if you are referred by another professional or health insurer, or as part of a medico-legal process.

The data we collect comprises of:

- Personal information, such as your name, email address, postal address and telephone numbers, and GP details.
- Sensitive information, such as your gender, social and medical history, and clinical notes from therapy sessions.

We will use your sensitive and personal data for the purposes of providing our services to you or if we need to comply with a legal obligation. Our legal ground of processing this data is your explicit consent.

We will use your non-sensitive personal data to (i) register you as a new client, (ii) manage payment, (iii) collect and recover monies owed to us (iv) to manage our relationship with you, (v) send you details of our goods and services.

Our legal grounds for processing your data are in relation to points (i) to (iv) above are for performance of a contract with you and in relation to (iii) and (v) above, necessary for our legitimate interests to develop our products/services and grow our business and to recover monies owed.

We will not share your details with third parties for marketing purposes except with your express consent.

### 2. Disclosure of your personal data

We may have to share your personal and sensitive data with (i) service providers who provide IT and system administration support including software providers for accounting, marketing and practice management solutions, (ii) professional advisors including other healthcare professionals, lawyers, accountants, bankers, auditors and insurers (iii) HMRC and other regulatory authorities (iv) third parties to whom we sell, transfer or merge parts of our business or our assets and/or (v) to other professionals for the purposes of discussing your treatment.

We require all of these third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on our instructions.

In certain circumstances, we may have a professional or legal duty to share your data without your consent, for example in the event of serious concerns about an individual's safety, or child safeguarding concerns. In such a situation, you will be informed of the need to share your data (when possible) and the information will only be shared with necessary statutory agencies, such as your GP or Social Care.

As part of maintaining their professional standards and accreditations, Clinical Psychologists are required to undertake regular supervision with another suitably qualified professional. Your information may be shared in anonymised form for the purpose of supervision. The supervisor will be bound by the same professional and legal standards around confidentiality and data protection.

### **3. International transfers**

Some of our third party providers may include businesses outside of the EEA in countries which do not always offer the same levels of protection for your personal data. We do our best to ensure a similar degree of security by ensuring that contracts, code of conduct or certification are in place which give your personal data the same protection it has within Europe. If we are not able to do so, we will request your explicit consent to the transfer and you can withdraw this consent at any time.

### **4. Data security**

We have put in place security measures to prevent your personal and sensitive data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal and sensitive data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal and sensitive data on our instructions and are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator where we are legally required to do so.

Your personal and sensitive information will be stored on our electronic cloud-based Clinic Management system, *WriteUpp*. Data sent via the internet to our *WriteUpp* account is encrypted 'in flight', and the account can only be accessed by Wilson Psychology Ltd. employees via a secure password and two-factor authentication. Personal and sensitive information may also be stored within a cloud-based document storage service, *Tresorit*, which uses end-to-end encryption. Our *Tresorit* account can only be accessed by Dr Flora Wilson via a secure password. Any sensitive information transmitted electronically via email will be encrypted and/or password protected. Please note that we cannot guarantee the security of your own email account and you accept responsibility for this when you consent for us to email you.

We do not routinely store identifiable paper records. Any information recorded on paper, such as rough session notes, will be transferred to a secure electronic format as soon as possible and then destroyed. If it is necessary to retain information on paper, this will be stored in a locked cabinet at Dr Flora Wilson's address.

We may anonymise your personal and sensitive data (so that you can no longer be identified from such data) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **5. Data retention**

We will only keep your personal and sensitive data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting, or reporting requirements. Mental health records are subject to special legislation e.g. adult records are kept for 7 years after the last contact with the service. This benchmark will be applied to all clinical records made in the process of engagement with our therapy. For any children we treat we are obliged to retain the medical information until 7 years after the child's 18th birthday.

You have the right to ask us to delete the personal and sensitive data we hold about you in certain circumstances. See section 6 below.

## **6. Your rights**

You are able to exercise certain rights in relation to your personal and sensitive data that we process.

These are set out in more detail at

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the request via email to: [flora@wilsonpsychology.co.uk](mailto:flora@wilsonpsychology.co.uk).

## **7. Keeping your data up to date**

We have a duty to keep your personal and sensitive data up to date and accurate so from time to time we will contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by writing to or emailing the addresses set out in section 6 above.

## **8. Complaints**

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.