### Privacy Policy

This privacy policy outlines how Kings Heath and Moseley Psychology Practice will collect, use, store and safeguard the data from visitors to our website. By using our website, you consent to the data practices outlined in this policy.

General Data Protection Regulations (GDPR) were introduced on 25<sup>th</sup> May 2018 to cover the data privacy of all UK and EU citizens. Under these regulations, we are required by law both to follow these regulations and to inform you of how we will protect your data and your privacy. All clinical practitioners working in our practice are registered with the UK Information Commissioner's Office (ICO) as data controllers and our registration numbers are:

- Bill Bell (registered as William Bell): ZA223925
- Jeanette McLoughlin: ZA489659

### 1 Why do we collect information from your use of our website?

We collect the information from your use of the website for the purposes of:

Enabling us to administer our web site and business and to provide a service to you.

Effectively managing queries or complaints about our web site.

With respect to information submitted to us through your use of the 'Enquiry Form', we have a lawful basis for holding and using your information in relation to the delivery of a service to you as a health care professional.

### 2 What is our policy regarding the use of cookies on our website?

Kings Heath and Moseley Psychology Practice website uses cookies only where absolutely necessary to display information on the website. They are not used on this website for storing data about anyone viewing the site. If you block or delete cookies this may have a negative impact upon the usability of some features on our website.

## 3 What assurances do we offer regarding the security of information provided to third party websites?

We have provided for your information, hyperlinks and details of useful, third party websites. We have no control over and are not responsible for the privacy policies and practices of third parties.

### 4 What information do we collect from your use of our website?

When you use our website information is automatically downloaded from your computer. This includes

• Your computer's IP address, number of visits made to the website, geographical location, page views, browser type, operating system and referral source.

• The date, time and frequency of your contacts.

If you choose to send us information through the Enquiry Form on our website this may include personal and potentially clinically relevant information. We have taken all reasonable precautions to ensure that your personal information is not altered, lost or misused. However, as the transmission of information over the internet is inherently insecure, we cannot guarantee the security of data sent in this way. We would therefore encourage you not to send highly sensitive information (e.g. personal information or bank details) through our website. Please note that before you disclose any personal information about another person, you should seek that person's consent to both the disclosure and the processing of that information in accordance with this policy.

# 5 What do we do with the data we collect from your use of our website and how do we keep it secure?

When we store information that we collect from you, this will be in the form of paper or electronic records which may include a database, and will be done in accordance with the legislation set out by the ICO as to what is deemed appropriate and reasonable.

Paper notes will be kept in a lockable filing cabinet which outside agencies do not have access to. Electronic information will be accessed and stored on an encrypted device/hard drive/cloud based server which outside agencies do not have access to. When away from our devices we will always lock them or log off.

On occasion we may also need to share your data. We each act as our own Data Controllers/Data Processors and data is not shared between us unless it is for the purposes of supervision or essential to the services that we provide. In general we do NOT share any personally identifiable information with any third party except in the following situations:

- As agreed by you
- If the information you share with us gives us reasonable concern about your own or someone else's safety and failure to disclose this information could result in significant harm (this is required of us by law and by our professional bodies)
- To the extent that we are required by law
- In order to protect our legal rights

If we do share your information with anyone we will email it from an encrypted email address, or send it by post to an address we have checked before we send it.

Because of the nature of our work we recognise that you may give us sensitive information and so we have ensured that we have password and firewall protected servers, additional security software on our website (https and SSL encryption), and obtained a non-disclosure from our website host.

### 6 How long will we keep any information collected from our website?

Your information will be kept for the time necessary to provide the service requested, but outside of this we will hold your details and notes for a further period of 7 years following the end of treatment to meet the legal obligations of our insurers. The only exception to this is:

- If we believe that the documents may be relevant to any legal proceedings
- In order to protect our legal rights.

After these time limits all data will be securely deleted.

### 7 What are your rights in regard to the data we hold about you?

You have the right to verify the accuracy or to ask for your records to be supplemented, deleted, updated or corrected.

You can request (in writing, verbally, in person or by phone) a copy of any personal information that we hold about you. Information will be provided to you within 30 days. In order to do this, we request:

- Evidence of your identity (e.g. a photocopy of your passport certified by a solicitor or bank) and evidence of your current address (e.g. a recent utility bill)

We may withhold personal information that you request as far as the law permits.

### **8 Further Questions**

After reading this policy if you have any questions, please get in touch with us via the contact details on our website.

### Updating our policy

We may at times update this policy either due to changes in the law or recommendations and will publish a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

Last reviewed January 2019