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Medical Herbalist

### **Privacy Policy**

1 I am Caroline Sheldrick MNIMH, a qualified and insured self-employed health care professional. I am a sole trader, working at several independent complementary health clinics.

2 I am the data controller in my business. I obtain consent from patients to hold their private data, including sensitive medical data. Information is handwritten and stored securely. Patients who give me their email addresses have this data stored on my personal computer which is password protected and in a private office. It is not on any mobile devices.

3 The lawful bases on which this data is collected are:

#### a) Consent

I make a clear, affirmative act of collecting data for a specific purpose. It is transparent and clear why the data is being collected. I keep a record of where that consent can be found including when it was given, by whom, how and for what purpose(s) and keep a copy of the original document used at the time. If a patient withdraws consent, I will take action as soon as possible.

I obtain **explicit consent** for processing sensitive data. I give all patients a form to sign plus my privacy policy. I keep this consent with their patient records.

In particular:

- data subjects are provided with a clear explanation of the processing to which they are consenting (clear plain language)
- the consent mechanism is genuinely of a voluntary and 'opt-in' nature
- data subjects can withdraw their consent easily
- I do not rely on silence or inactivity to collect consent.

#### b) Contract

In essence, patients are paying for my services and are therefore entering into a contract with me.

Processing of sensitive data is necessary for me to be able to provide my services. I would be unable to fulfill my obligations to my patients unless I process their data e.g. take a medical history, write and dispense a prescription, provide appointments etc.

4 I will use the data to devise a treatment plan including prescriptions for individual patients. I use the data in order to communicate with patients while they are under my care.

5 Data will be shared with no one else, without the express consent of the data subject, for example, if I write to the patient's doctor, with their permission. I am also required by law to report any notifiable disease.

6 Any data subject can see, amend or delete their personal data on request.

7 Under the terms of my insurance, I am required to hold patient details for seven years in case a claim is made against me.

7 If you have a complaint or concern, please tell me, or contact the ICO

<https://ico.org.uk>

8 My Privacy Policy will be reviewed in May 2019.