Privacy Policy for Schia Mitchell Sinclair MSc MNIMH RCST

As a Craniosacral Therapist and Medical Herbalist, the privacy and security of my clients' personal information is very important to me. This policy explains what personal information I collect, why I collect it, how I use and protect it, and the circumstances in which it may be processed by other organisations on my behalf.

I am responsible for deciding how and why your personal information is processed and am therefore the data controller for the information I hold about you.

I will keep this policy updated and a link to the current version will be available on my website.

What information I collect

Depending on the services you use, I may collect and keep records including:

- your name, date of birth and contact details
- appointment and booking information
- information about your medical history, current health, symptoms and conditions
- information about medications, supplements and other treatments
- information relating to the herbal medicines or other recommendations I make
- relevant information that you provide to me as part of your treatment
- invoices and payment records
- information relating to communications between us.

Some of the health information I collect is considered **special category personal data** under data protection law because it concerns your health.

What I use your information for

I use your information in order to:

- provide you with safe and appropriate herbal medicine and/or craniosacral therapy
- keep appropriate clinical records
- manage appointments and communicate with you about your treatment
- provide information, recommendations or follow-up relating to your care
- process and record payments

- meet my professional, legal and insurance requirements
- deal with queries or requests relating to your records.

I will only collect and use information that is relevant and necessary for these purposes.

Why I am allowed to use your information

I use your personal information because it is necessary for me to provide and manage your care, keep appropriate professional records, manage appointments and payments, and meet my professional and legal responsibilities.

For health information, which is special category personal data, I rely on the provisions of UK data protection law that allow health and social care professionals to process health information for the provision of health care or treatment, subject to appropriate safeguards and duties of confidentiality.

Where I use your information for other purposes, such as sending marketing emails, I will only do so where I have an appropriate lawful basis and, where required, your consent.

Services I use to manage my practice

I use a small number of trusted third-party service providers to help me run my practice. Where these organisations process personal information on my behalf, they do so under appropriate data protection arrangements.

Practice Better

I use **Practice Better**, operated by Green Patch Inc., for appointment booking, client records, consultation information, invoices, secure client messaging and other practice-management functions.

Practice Better acts as a data processor on my behalf. It processes personal information including contact details, appointment information, billing information and health information.

Practice Better stores client data using cloud infrastructure in North America, including servers operated by Amazon Web Services in the United States. Appropriate safeguards are in place for international transfers of personal data in accordance with UK data protection requirements.

Further information about Practice Better's privacy and security arrangements, including its current list of sub-processors, is available through Practice Better's Privacy Policy and Trust Centre.

Payment processing

Some payments are processed through Practice Better using **Stripe**. Practice Better does not store clients' full payment card details; payment information is processed by Stripe.

I also use **SumUp** to process some payments made in person.

These payment providers process the information necessary to make and record payments and have their own privacy and security arrangements.

MailerLite

I use **MailerLite** to send occasional marketing emails, such as information about talks, courses or other relevant activities.

I only send these marketing emails to people who have chosen to receive them. You can unsubscribe at any time using the unsubscribe facility in the email or by contacting me directly.

Marketing preferences do not affect your treatment or any other communication that is necessary for your care or appointments.

Website and email

My website and my practice email accounts are hosted by **Mythic Beasts**.

Mythic Beasts processes information as necessary to provide website and email hosting services. This may include technical information such as IP addresses and information contained in emails sent to or from my practice email accounts.

How I protect your information

I take reasonable technical and organisational measures to protect your personal information against loss, misuse, unauthorised access or disclosure.

Paper records, where used, are kept securely. Electronic records are held in password-protected systems and access is restricted to me and to the service providers who need to process information in order to provide their services.

The organisations I use to process personal information are responsible for maintaining appropriate security measures within their own systems.

How long I keep your information

I retain clinical records for at least seven years after your last appointment. For anyone under 18, records are retained until at least their 25th birthday. My professional association recommends that records are retained indefinitely where possible, and I may therefore retain records for longer where appropriate.

Some records may therefore need to be retained after you have finished having treatment with me. I will securely dispose of or delete information when it is no longer necessary to retain it.

Paper records that are no longer required will be securely destroyed, for example by shredding.

When information may be disclosed

I will normally only use your information for the purposes described in this policy.

There may, however, be circumstances in which I am legally required to disclose information, or where disclosure is necessary to meet a legal, professional or safeguarding obligation.

If I need to use or disclose your information for a purpose that is not covered by this policy, I will explain this to you where I am able to do so.

Marketing

I occasionally send emails about talks, courses or other activities that may be of interest to clients and contacts.

I will not use your contact details for these marketing emails unless you have indicated that you would like to receive them.

If you change your mind, you can unsubscribe at any time or contact me and ask me to remove you from my marketing list. This will not affect your treatment or any necessary communication regarding your appointments or health.

Your rights

Under UK data protection law you have rights in relation to the personal information I hold about you. Depending on the circumstances, these may include the right to:

- ask what personal information I hold about you
- request a copy of your information
- ask me to correct inaccurate information
- ask me to restrict how I use your information
- object to certain types of processing
- request deletion of information where there is no longer a lawful reason for me to retain it.

These rights are subject to certain exceptions. In particular, I may need to retain clinical records to meet legal, professional, insurance or other legitimate obligations.

If you would like to exercise any of these rights, please contact me using the details below.

Queries or requests

If you have any questions about this Privacy Policy, would like to know more about how your information is used, or wish to make a request concerning your personal information, please contact me at:

herbalist@cambridgeherbalist.org.uk

or

cranio@cambridgeherbalist.org.uk

You also have the right to raise a concern with the **Information Commissioner's Office (ICO)** if you believe that your personal information has not been handled appropriately.

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