

# Privacy Policy

## Personal Information

From May 25 2018 there will be a new set of regulations that ensure that all of our personal information will be protected. The General Data Protection Regulations (GDPR) will replace the existing Data Protection Act of 1998 and will bring the regulations up to date and help protect our personal information.

At various times during your interaction with Annabel Mitchell, you will be asked to provide personal information. This document tells you what information Annabel will request and why she needs it, what information is stored, and how it is processed.

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 Data Protection Act requirements:

- 1. I will collect and record clinical information taken during your initial consultation and each subsequent appointment to enable me to make an accurate diagnosis of your problem(s) and to formulate an appropriate treatment and management plan. Your requesting treatment and our 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. Should these details change, it is important that you let me know so that we can ensure your records are updated. 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 leaflets or advertisements. You may withdraw this consent at any time – just let me know by any convenient method.**

## Data Processing

I have a legal obligation to retain your records for 7 years after your most recent appointment. In the case of minors records must be kept until the patient reaches the age of twenty-five (seven years after reaching eighteen). 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 on paper, in individual paper files, and in a secure locked cabinet in my home clinic. For those who see me at The London Acupuncture Clinic, your files are also secured in a cabinet. For registration forms sent by email, these notes are stored electronically on my home computer or tablet, both are password protected.

I also keep a file on my password protected computer at home which stores patient receipts for only those who request a receipt (for the purpose of making a private health insurance claim). These receipts mostly record dates of acupuncture appointments, date of birth and the address of the client

requesting the receipt (depending on what information your insurer requires). These documents are only seen by myself and are purely for record keeping.

I am the only person who has access to your records, receipts and emails. I will never share your information with anyone who does not have a legal right of access without your written consent.

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 client 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.

On some occasions when I am not available I may refer you to an acupuncture colleague. In that case I will ask you whether you agree or object to information about your health being passed on to my colleague and will act accordingly.

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. Other than for emergency treatment I will always ask you whether you agree or object to information about your health being passed on to another health practitioner and will act accordingly.

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/>

Annabel Mitchell, London, May 2018