

## Privacy Policy

### **Wee Brains Neurology's Privacy Policy**

#### **1.0 Introduction**

Wee Brains Neurology uses the information collected in accordance with all UK laws concerning the protection of personal data, including the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) 2018. Dr Micheal Taylor is the data controller. If another party has access to your data you will be informed they acting as a data controller or a data processor, who they are, what they are doing with your data and why they are required to be provided with the information. If your questions are not fully answered please contact Wee Brains Neurology. If you are not satisfied you can contact the Information Commissioner's Office (ICO) <https://ico.org.uk>. Further details are included at the end of this policy.

#### **2.0 Contact details**

Name: Dr Micheal Taylor

E-mail: [info@weebrainsneurology.com](mailto:info@weebrainsneurology.com)

#### **3.0 The type of personal information we collect**

Wee Brains Neurology collects and processes the following personal data:

##### *3.1 Private Patients:*

- Personal data: basic contact information including name, date of birth, postal address, email address, contact number. Emergency contact details and/or next of kin details, and GP contact details.

- Sensitive personal data: medical history/ records (e.g notes, letters, reports, forms and outcome measures).
- Web-based enquiry form, we will also collect any information you provide to us as well as your internet protocol (IP) address. This is automatically supplied by the website software used to offer the form. All web services used by Wee Brains Neurology are verified by themselves as GDPR compliant.
- Third party information: for example, if we receive a referral from another health professional (such as your Doctor or Occupational Therapist). If you are referred by your health insurance provider, then we will also collect, and process personal data provided by that organisation. This includes basic contact information, referral information, and health insurance policy number and authorisation for treatment.

### *3.2 Browsing Wee Brains Neurology's Website*

- When you engage with this media your information will be stored in the form of cookies. We gather general information (not personally identifiable information) which might include which pages are visited most often and which services, events or information are of most interest to our web site visitors. You can opt out of this from the website when the pop up appears.
- Wee Brains Neurology's website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell services to you. Your data (limited to name, e-mail address and telephone number) may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

## **4.0 How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To communicate with you to arrange and remind you of appointments.
- To keep any clinical notes arising from appointments and related cancellations or communications between us.

- To conduct a clinical review
- To devise and implement an effective treatment plan
- To communicate where necessary with relevant third parties to support your treatment and manage any risks which may arise
- To create your invoice and process your payment

We may also ask for information on how you found our service for the purpose of our own marketing research. No information you provide is passed on without your consent. We will never sell your information to others.

Any personal information we hold about you is stored and processed in line with The Data Protection Act 1998 (in force on the date this statement became operational) and the General Data Protection Regulation (Regulation (EU) 2016/679) adopted on 27th April 2016 and enforceable from 25th May 2018.

Wee Brains Neurology will not share any of your information with others, except in the following circumstances:

- With your permission – this is necessary in relation to sharing letters etc with GP, Schools, other medical professionals including your NHS team, and any allied professionals deemed necessary.
- The law allows it
- It should be noted that you have no right to refuse information sharing in regards to significant safeguarding and safety concerns – as a Mandatory Reporter, I will be required to escalate to appropriate authorities if:
  - It is in your best interests, such as preventing you from seriously harming yourself.
  - It is in the public interest, such as if it is necessary to protect public safety or prevent harm to other people.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are: Wee Brains Neurology has a legitimate interest in

using the personal data and sensitive personal data we collect to provide health treatment. It is necessary for us to provide medical care to patients.

## **5.0 How we store your personal information**

Your information is securely stored.

Notes will be taken during and after each clinical appointment which will be kept in accordance with the General Data Protection Regulation 2018 (GDPR)

Personal information is minimised in phone and email communication. Email applications use private (SSL) settings, which encrypts email traffic so that it cannot be read at any point between our computing devices and our mail server. Wee Brains Neurology will never use open or unsecure Wi-Fi networks to send any personal data. Wee Brains Neurology's e-mail provider includes encryptions, however the security of your e-mail provider cannot be guaranteed so please be aware of this when communicating with Wee Brains Neurology in this way.

Passwords are changed every 90 days and passwords are not shared.

Wee Brains Neurology's website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell services to you. Your data (name, e-mail address and telephone number) may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

## **6.0 How long is your information stored for**

We only retain personal information for as long as is reasonable and necessary for the relevant activity.

- In circumstances where someone has received clinical review with Wee Brains Neurology, we comply with all statutory obligations relating to the proper time frames for storage of clinical information. As these records form part of your medical history and may be required by you, your doctor(s) or health care team in the future Wee Brains Neurology keeps all patient electronic records for a full 7 years after your treatment has ended as this is the minimum/maximum length of time for records to be retained and then permanently and securely erased. You have the right to ask for your data to be deleted but Wee Brains Neurology do not have to comply with this request if there is a legitimate reason for continuing to retain this data (for example possible future legal requests).
- Contact information is stored for a period of 6 months if you do not become a client of Wee Brains Neurology and then permanently and securely deleted.
- Invoices are stored for seven years as this is the required length to comply with the HMRC requirements.

## **7.0 Your data protection rights**

Under data protection law, you have rights including:

### *7.1 Your right of access*

You have the right to ask us for copies of your personal information.

You have a right to get copies of your data and can ask to do so in writing by e-mail. Making this request is called a 'subject access request'. You can make a subject access request (SAR) by contacting Wee Brains Neurology. Additional verification will be required to ensure that you are who you say you are to process this request. Wee Brains Neurology may withhold such personal information to the extent permitted by law. In practice, this means that information may not be provided if Wee Brains Neurology considers that providing the information will violate your vital interests. If you make such a request Wee Brains Neurology will need a short amount of time to process this request but would expect to be able to send you the information within 30 days.

## *7.2 Your right to rectification*

You have the right to ask Wee Brains Neurology to rectify personal information you think is inaccurate. You also have the right to ask Wee Brains Neurology to complete information you think is incomplete. In order to exercise your right to challenge the accuracy of data and for it to be corrected this should be done in writing. Additional verification will be required to ensure that you are who you say you are to process this request. You should:

- state clearly what you believe is inaccurate or incomplete - explain how it should be corrected
- where available, provide evidence for inaccuracies

After your data has been corrected in the system, you will be sent a copy of the updated information as described above with SARs.

## *7.3 Your right to erasure*

You have the right to ask us to erase your personal information in certain circumstances. If you want to have your data removed, Wee Brains Neurology will have to determine if the data needs to be kept. This means that because your information has been collected lawfully and with a specific purpose, and forms part of your medical record it must be kept on file for a fixed period of time and cannot be deleted. If Wee Brains Neurology decides that she should delete the data, she will do so without undue delay.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at [info@weebrainsneurology.com](mailto:info@weebrainsneurology.com) if you wish to make a request.

## **8.0 How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@weebrainsneurology.com](mailto:info@weebrainsneurology.com)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>