

## **easibirthing Privacy Policy for hypnobirthing and therapy service clients**

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection. It came into effect on 25th May 2018.

GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. **easibirthing** is committed to protecting the rights and freedoms of individuals with respect to the processing of clients' personal data.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

### **GDPR includes 7 rights for individuals**

#### **1) The right to be informed**

**easibirthing** is a registered trademark and company owned and managed by Sharon Mustard. I am a registered UKCP hypno-psychotherapist As an accredited member of the 'UK Council for Psychotherapy', a fellow of the 'National Society of Hypnosis and Psychotherapy', and the 'Complementary and Natural Healthcare Council', I am required to abide by their Code of Ethics and Practice.

We provide hypnobirthing group courses, workshops on behalf of the National Health Service (nhs) and one-to-one hypnobirthing and hypnotherapy/psychotherapy services for fertility, pregnancy and in the post natal period.

We provide training for hypnotherapists and individuals currently in training to become hypnotherapists in the subjects of hypnosis for fertility, pregnancy, childbirth and post-natal mental health.

The basis on which I keep client data is that of "Legitimate Interests". This means that the data is necessary for me to fulfil the contract that we have together (ie to provide therapy) and that it is data that you would reasonably expect me to hold and use.

For those who enquire about therapy, the data I hold includes any information you have sent me by email/text/message.

For those who book and attend at least one session, the data I hold includes:

- Basic information such as name, email address, phone number
- Information that you give me as part of the work we do together
- Records of what interventions that I use (or potentially do not use) in our sessions
- Emails, texts and/or messages that are sent between us
- Information sent from any third party, eg GP, insurance company, EAP

Some of the information that you give me may fall under the definition of special category of data as defined by the General Data Protection Regulation. The condition for processing this special data is (precised from the Act) "processing is necessary for medical diagnosis, the provision of health care or treatment pursuant to contract with a health professional".

Data is not shared with anyone, except possibly your GP, and for any reasons covered by the Requirements for Disclosure which are detailed and discussed when we first meet.

The data is primarily used to enable me to provide therapy for you. It may also be used scientific research purposes and statistical purposes.

**easibirthing** uses Cookies on its website to collect data for Google Analytics, this data is anonymous. Cookies are small pieces of information that are stored by your browser on your device's hard-drive. They are used to distinguish individual users, and help us improve our website. Analytics and search engines providers that assist us in the improvement and optimisation of our site may collect data about your IP and computer set up.

## 2) The right of access

Sharon Mustard, **easibirthing**, Office 6 Enterprise House, Boathouse Meadow Business Park, Cherry Orchard Lane, Salisbury, SP2 7LD is the named data controller for **easibirthing**.

At any point an individual can make a request relating to their data and **easibirthing** will need to provide a response (within 1 month).

## 3) The right to erasure

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However **easibirthing** has a legal duty to keep individual details for a reasonable time\*, **easibirthing** obtain these records for 7 years after using **easibirthing** services. This data is archived electronically and in paper form securely onsite and shredded after the legal retention period.

## 4) The right to restrict processing

Clients can object to **easibirthing** processing their data. This means that records can be stored but must not be used in any way, for statistical reports or for research.

## 5) The right to data portability

**easibirthing** requires data to be transferred from one IT system to another; when using external XERO accountancy software. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

## 6) The right to object

Individuals can object to their data being used for certain activities like marketing or research. **easibirthing** will only use your details with your permission as part of a secure mailing list to email you details of future **easibirthing** courses that may be of interest to you prior to your due date. These details will never be used for any other form of marketing nor be given to another organisation for marketing their own products and services.

## 7) The right not to be subject to automated decision-making including profiling.

Automated decisions and profiling are used for marketing based organisations. **easibirthing** does not use personal data for such purposes.

### Storage and use of personal information

All paper copies of individual training records are kept in a locked filing cabinet in **easibirthing** offices (accessed only by Sharon Mustard). All information is confidential and these records remain on site at all times, including for archiving. These records are shredded after the retention period.

**easibirthing** collects personal data every year including; names, telephone numbers and email addresses of those on the waiting list for a course or who have asked to be informed of future courses via a mailing list.

**easibirthing** stores personal data held visually in birth stories, photographs or video clips or as sound recordings, only where full written consent has been obtained. No full names are stored with images in photo albums, displays, on the website or on **easibirthing**'s social media sites.

Data of names, email addresses, telephone numbers is also held electronically on a computer hard drive and on a cloud storage system. Access to all office computers, cloud accounts and to websites is password protected.

GDPR means that **easibirthing** must;

- \* Manage and process personal data properly
- \* Protect the individual's rights to privacy
- \* Provide an individual with access to all personal information held on them

If there is any breach of data security, **easibirthing** will give full details to the Information Commissioners Office and any person affected within 72 hours of the breach and do all possible to minimise any potential impact.

This Policy was adapted at **easibirthing** on 25th April 2018.