

AoR Privacy Policy Template for Members

GUIDANCE

How to use this template

- This template has been designed to help you to create your own Privacy Policy for your business.
- Anything in **red, bold italics** needs information adding / deleting by you as appropriate for your business circumstances
- We have included suggested wording that may be relevant to your Reflexology Business.
- Helpful tip boxes are there for your information and should be deleted from your final template
- This is YOUR Privacy Policy so ensure it is relevant to YOUR business
- Note that, whether you use the AoR template or create your own, the information must be clear and easy to understand. Particular care must be taken when providing this to a child or perhaps a vulnerable person, to ensure that they can understand it.
- You may also need to take special care with the wording when the client's own language is not English. And consider whether you need to provide a Welsh language version.

Useful Links

[Full details of an individual's rights](#)
[What constitutes personal information?](#)
[What is Lawful Basis for Processing data?](#)
[Lawful Basis Interactive guidance tool](#)
[Special Category Data – At a glance](#)
[ICO guidance on writing a privacy policy](#)
[Information Commissioner's Office Website](#)

Please note:

This Privacy Policy template reflects our understanding of GDPR at the time of production (November 2022). It will get updated as needed, but we cannot guarantee that it will meet all of GDPR conditions in the future.

STANDARD DISCLAIMER

Although the AoR takes all reasonable care to ensure that the information in this communication is accurate, we cannot guarantee that it is free from inaccuracies, errors or omissions. No information given by the AoR should be taken as legal advice, nor should it take the place of medical care or advice given by primary healthcare providers. As such, the AoR shall not be liable for any loss or damage whatsoever arising from any information contained in this communication.

Helpful Tips:

- Ensure your privacy policy is written clearly and use simple language so that people can understand.
- There is no need for your privacy policy to be long and complicated.
- Ensure your privacy policy is freely available and easy to access by those whose personal data you collect.
- The most important thing is that your client knows where to find your privacy policy. It could be a poster, a webpage, a pop up on your site, or a printed copy handed to them at the start of your first session.
- Ensure you have a way of recording that each client has read and understood your privacy policy. This may be via a checkbox on your website, or on your initial Client Information form.
- Review your privacy policy regularly and notify your clients of any changes.

***[Insert business name]* Privacy Policy**

Our contact details

Name:

Address:

Phone Number:

E-mail:

Helpful Tips:

- Insert the contact details for your business. You should include a postal address, any main email addresses, phone numbers or web addresses.
- Include the date you completed the privacy notice in the footer.

The type of personal information we collect

In order to give professional reflexology treatments, I will need to ask for and keep information about your health. I will only use this for informing reflexology treatments and any advice I give as a result of your treatment. The information to be held is:

- Your contact details
- Medical history and other health-related information
- Treatment details and related notes
- ***[Add to this list as appropriate]***

Helpful Tips:

- Tell people about the type of personal information you collect.
- Personal information is any information that can be used to identify a living person. For example members' email addresses, customer financial information, employee data or website user stats.
- You can find more about [what constitutes personal information](#) on the ICO website.

How we get the personal information and why we hold it

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

- For informing reflexology treatments and any advice I give as a result of your treatment.
- ***[Add any other reasons you collect personal information]***

We use the information that you have given us in order to:

- Provide you with the best possible treatment options, support and advice.
- ***[list any other ways in which you use the personal information]***.

We may share this information with ***[enter organisations or individuals]***.

Helpful Tips:

- Tell people how you collect their personal information and where you collect the information from.
- Tell people about any instances in which you pass personal information to a third party and outline your reasons for this.

Lawful Basis for holding and using Client Information

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing this information are: ***[delete as appropriate]***

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting *[insert contact details]*

(b) We have a contractual obligation

(c) We have a legal obligation: *[delete any which are not applicable]*:

- 1.1. 'Claims occurring' insurance: (records to be kept for 7 years after last treatment)
- 1.2. Law regarding children's records (records to be kept until the child is 25 or if 17 when treated, then 26)
- 1.3. CNHC requirements to retain information for 8 years
- 1.4. [Specify any other constraint regarding retaining client information]***

(d) We have a vital interest

(e) We need it to perform a public task

(f) We have a legitimate interest *[i.e.my requirement to retain the information in order to provide you with the best possible treatment options and advice]*

As I hold special category data (i.e. health related information), the additional condition under which I hold and use this information is: for me to fulfil my role as a health care practitioner bound under the AoR Confidentiality as defined in the AoR Code of Practice and Ethics. *[Modify this if needed to suit your specific circumstances].*

Helpful Tips:

- We have obtained agreement from the ICO that AoR Members may be treated as Healthcare Professionals for the purposes of obtaining special category data.
- It is likely that your reason for holding personal information will be “legal obligation” therefore you will need to select one or more reasons from (c) 1.1-1.3
- Useful tools: [lawful basis guidance](#) and [interactive tool](#) on the ICO website.
- If you are relying on consent to process individual’s information, then you must also tell people about their right to withdraw consent and how they can do this.
- Special Category data: Data concerning health is classed as special category data and require specific protection. We have suggested a statement for AoR Members to use, however check it is relevant for you and your business.

How we store your personal information

Protecting your Personal Data

I am committed to ensuring that your personal data is secure. In order to prevent unauthorised access or disclosure, I have put in place appropriate technical, physical and managerial procedures to safeguard and secure the information we collect from you.

I will contact you using the contact preferences you have given me.

We keep *[type of personal information]* for *[time period]*. We will then dispose your information by *[explain how you will delete their data]*.

Your data protection rights

Under data protection law, you have rights including:

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

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

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 *[insert email address, phone number and or postal address]* if you wish to make a request.

Helpful Tips:

- The [lawful basis](#) page of the ICO Guide to the GDPR has a useful table that shows the varying rights that apply depending on the lawful basis.

THERAPIST'S RIGHTS

Please note:

- If you don't agree to your therapist keeping records of information about you and your treatments, or if you don't allow them to use the information in the way they need to for treatments, the therapist may not be able to treat you
- Your therapist has to keep your records of treatment for a certain period as described above, which may mean that even if you ask them to erase any details about you, they might have to keep these details until after that period has passed
- Your therapist can move their records between their computers and IT systems, as long as your details are protected from being seen by others without your permission.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at *[Insert your contact details]*.

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>