

Karen Rowlands-Hall

Registered Homeopath

DATA PROTECTION POLICY

Scope of the policy

This policy applies to the work of homeopath Karen Rowlands-Hall (hereafter referred to as 'KRH'). The policy sets out the requirements that KRH has in order to gather personal information for professional purposes. The policy details how personal information will be gathered, stored and managed in line with data protection principles and the General Data Protection Regulation. The policy is reviewed on an ongoing basis to ensure that it is compliant. This policy should be read in tandem with the KRH's Privacy Policy.

Why this policy exists

This data protection policy ensures that KRH:

- complies with data protection law and follows good practice
- protects the rights of patients
- is open about how she stores and processes patients' data
- protects herself from the risks of a data breach

Data protection principles

The General Data Protection Regulation identifies 8 data protection principles.

Principle 1 - Personal data shall be processed lawfully, fairly and in a transparent manner

Principle 2 - Personal data can only be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

Principle 3 - The collection of personal data must be adequate, relevant and limited to what is necessary compared to the purpose(s) data is collected for.

Principle 4 – Personal data held should be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.

Principle 5 – Personal data which is kept in a form which permits identification of individuals shall not be kept for longer than is necessary.

Principle 6 - Personal data must be processed in accordance with the individuals' rights.

Principle 7 - Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Principle 8 - Personal data cannot be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relation to the processing of personal data.

Certain of these principles are expanded upon in the sections that follow.

Lawful, fair and transparent data processing

KRH requests personal information from patients and potential patients for the purpose of consulting with them and providing them with advice and guidance on homeopathic treatments. The forms used to request personal information may contain a privacy statement informing patients and potential patients why the information is being requested and what the information will be used for. Patients will be asked to provide consent for their data to be held and a record of this consent along with patient information will be securely held. Patients will be informed that they can, at any time, remove their consent and will be informed as to what to do should they wish to do so.

Processed for Specified, Explicit and Legitimate Purposes

Patients will be informed how their information will be used and KRH will seek to ensure that patients' information is not used inappropriately. Appropriate use of information provided by patients includes:

- Communicating with patients in order to make, change or cancel consultations
- Assessing the conditions and issues reported by patients and devising and prescribing relevant remedies and therapies.

KRH will ensure that patients' information is managed in such a way as to not infringe an individual' rights which include:

- The right to be informed
- The right of access
- The right to rectification
- The right to restrict processing
- The right to data portability
- The right to object.

Adequate, Relevant and Limited Data Processing

KRH patients will only be asked to provide information that is relevant to support consultations and prescription. This includes:

- Name
- Date of birth