

PRIVACY POLICY

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

1 - **Bradley Dearman Hypnotherapy**, based at **107, Crescent Drive South, Brighton, East Sussex, BN2 6SB**, which hereafter for the purposes of this Privacy Notice will be referred to as **Bradley Dearman**, is pleased to provide the following information:

2 - Who we are.

Bradley Dearman provides group and individual services for emotional health and wellbeing, Courses and treatments are carried out in accordance with the General Hypnotherapy Council Code of Ethics <http://www.general-hypnotherapy-register.com/code-of-ethics>. **The practice may also provide other services, about which Bradley Dearman will be pleased to provide more details.**

3 - Personal Data.

a) For the purposes of providing treatment, Bradley Dearman may require detailed personal and medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your emotional and physical health. This data is always held securely and is not shared with anyone not involved in your treatment. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Bradley Dearman to document and process your personal data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide other information concerning your treatment.

b) For marketing purposes, Bradley Dearman may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.

c) In making initial contact with the practice you consent to Bradley Dearman maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. Bradley Dearman does not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this Privacy Notice or via the website here: <https://www.bradleydearmanhypnotherapy.co.uk>

d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

e) Our web host webmail123 sets a "session cookie" to allow its platform to work but it does not record any personal data and is deleted as soon as you close your browser.

f) Bradley Dearman will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

4 - Legal basis for processing any personal data.

To meet our contractual obligations obtained from explicit Client Consent and legitimate interest to respond to enquiries concerning the services provided.

5 - Legitimate interests pursued by Bradley Dearman.

To promote treatments and services for clients with all types of emotional problems indicated for hypnotherapy.

6 – Consent.

Through agreeing to this privacy notice you are consenting to Bradley Dearman processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address, telephone number and website form provided at the end of this Privacy Notice.

7 – Disclosure.

Bradley Dearman will keep your personal information safe and secure, only staff engaged in providing your treatment will have access to your personal records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Bradley Dearman will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

8 - Retention Policy.

Bradley Dearman will process personal data during the duration of any treatment and will continue to store only the personal data needed for seven years after the contract has expired to meet any legal obligations. After seven years all personal data held electronically will be deleted, written notes will be destroyed by shredding, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25. **This is based on legal and professional regulatory compliance. You have a right to request erasure under the General Data Protection Register, however this is limited by my need to comply with the terms of my data retention policy.**

9 - Data storage.

All Data is held in the United Kingdom. Bradley Dearman does not store personal data outside the EEA. Paper records are kept in a secure location in a locked filing cabinet. Treatment notes are hand written and assigned a numerical code. These notes are kept separately from records with contact details such as name, telephone numbers, email addresses, postal addresses. Contact information maybe held electronically and is password protected.

10 - Your rights as a data subject.

At any point whilst Bradley Dearman is in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.

- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Bradley Dearman refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request Bradley Dearman can confirm what information it holds about you and how it is processed.

11 - You can request the following information:

- Identity and the contact details of the person or organisation (Bradley Dearman) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Bradley Dearman and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 - To access what personal data is held, identification will be required.

Bradley Dearman will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Bradley Dearman is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to info@bradleydearmanhypnotherapy.co.uk or by phoning 0771 703 0002 or writing to us at the address further below.

13 - Complaints.

In the event that you wish to make a complaint about how your personal data is being processed by Anne Bryson you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

Bradley Dearman Hypnotherapy, Bradley Dearman, 107 Crescent Drive South, Brighton, East Sussex BN2 6SB. Telephone 0771 703 0002 or email: info@bradleydearmanhypnotherapy.co.uk

ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5A Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>