

Dr Rosy Daniel Privacy Policy

This Privacy Policy applies to information that Dr Rosy Daniel collects about individuals who consult with her. It explains what personal information she collects and how she stores and uses it. If you have any comments or questions about this policy, feel free to contact Dr Daniel at rosy@drrosydaniel.org.

1. Your personal data - The following table explains the types of data collected and the legal basis, under current data protection legislation, on which this data is recorded, processed and stored by either Dr Rosy Daniel or her Personal Assistant, who is bound explicitly by professional confidentiality.

Data recorded	Key Elements	Basis
Enquiring about Dr Daniel's clinic by email	Email record	Legitimate interests - it is necessary for me to read and store your message so that I can respond in the way that you would expect.
Booking of an appointment for consultation by telephone, Skype or in person recorded on my Setmore booking system.	Name, address, email, telephone number	Legitimate interests – it is necessary for me to hold your information in my Setmore Booking System so that we both know when your appointments are happening.
Payments for appointments which are taken on the Square online payment system	Name, address, email recorded by Square along with the amount payable and received. Your card details are not recorded or held by Square or by Dr Rosy Daniel.	Legitimate interests – it is necessary for Square to record your personal data in order for your payment to be attributed to you.

<p>Creating your personal paper file and a digital file of any records, reports and results that you send to me</p>	<p>Name, address, telephone number; date of birth, next of kin, plus any personal narrative, reports, letters or test results that you wish to share with me.</p>	<p>Legitimate interests – it is necessary for me to create a personal file for you to record all the history that you share with me initially and at all subsequent visits and to hold your records, reports and tests results safely for a minimum of 7 years from the time of the last consultation</p>
<p>Taking your personal history and storing my written notes in a paper file which is stored under lock and key in my office accessible only to me and my personal assistant, who is bound explicitly by confidentiality and who does not read material contained in personal files.</p>	<p>Current condition, past medical history, treatments in progress, emotional and spiritual history, triggers that have undermined your health and well-being, use of complementary therapies, nutritional, immune and self-help approaches; current state, needs, values, wishes and goals for our consultation.</p>	<p>Legitimate interests – it is necessary for me to ascertain what you are dealing with and what your state, needs, values, wishes and goals are so that I can make the most helpful suggestions to you for effective and relevant self-help.</p>
<p>Creating your personal report and session summaries</p>	<p>Summary of what I have learned about you and set of proposals for how you might best help yourself going forward.</p>	<p>Legitimate Interests – it is important for you to receive a comprehensive written report after our initial session and email summaries of follow up sessions if there are new recommendations in order that you gain greatest value out of our work together and can remember all that has been discussed and proposed.</p>

Adding you to a Mailchimp database so that you receive notifications and updates about my practice, recommendations and invitations to healthy holidays	Name and email address	Legitimate interests – it is important for me to be able to update you about any changes to my clinic, service and recommendations. It is also valuable for you to receive encouragement, new scientific evidence and invitations to events and holidays which could further boost your health, wellbeing and resilience.
Cookies & usage tracking	Website activity collected through cookies	Legitimate interests - it is necessary for Dr Daniel’s website to store a small amount of information, usually through cookies, to deliver functionality that you would expect from a modern website.

2. How Dr Daniel uses your data

Dr Daniel will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, she may use your personal information to:

- reply to enquiries you send to her
- store booking details that you initiate
- create and maintain a personal file for you to store your history, records, results and correspondence

3. When Dr Daniel shares your data

Dr Daniel will only pass your data to third parties in the following circumstances:

- you have provided your consent for us to pass data to a named third party to order a test or to make a referral for a specialist opinion or therapeutic consultation
- we are required by law to share your data if you are at serious risk of harming yourself or others

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

Dr Daniel is required by law to keep your personal file record for a minimum of 7 years after the last consultation that you have with her. After this time she is allowed to delete your record. Therefore if you consult with Dr Daniel after a gap of 7 years, it is probable that you will have to go through the process of registration, file creation and history taking again. Dr Daniel takes the principles of data minimisation and removal seriously and has internal policies in place to ensure that she only ever asks for the minimum amount of data to be of best service to you and deletes that data promptly once it is no longer required. Where data is collected on the basis of consent, she will seek renewal of consent at least every three years.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of Dr Daniel's Mailchimp messages).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with Dr Daniel via rosy@drrosydaniel.org .

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, counting the number of people looking at a website.

Where cookies are used to collect personal data, these would only be for the purposes in section 1 above. However, Dr Daniel does not use cookies for this purpose relying entirely upon personal data recording that she makes herself. However, Dr Daniel's website may also use some cookies that do not collect personal information but that help to collect anonymous information about how people use our website. She uses Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <https://policies.google.com/privacy>.

7. Modifications

Dr Daniel may modify this Privacy Policy from time to time and will publish the most current version on her website. If a modification meaningfully reduces your rights, you will be notified you via the Mialchimp service for as long as you remain subscribed to this messaging service provided by Dr Daniel.

8. Policy Date

Dr Daniel's Privacy Policy was last reviewed in December 2019 and will remain in force ongoing from this time, with reviews being triggered by any changes in GDPR legislation from time to time.

Dr Rosy Daniel

