## **Customer Privacy Notice**

## **New Beginnings Therapy Limited customer privacy notice**

This privacy notice tells you what to expect us to do with your personal information.

### **Contact details**

Post:

Ashby Town Council, Legion House, South Street, ASHBY-DE-LA-ZOUCH, Leicestershire, LE65 1BQ

Telephone: 07500716801

Email: julie@newbeginningstherapy.org.uk

### What information we collect, use, and why

We collect or use the following information to provide services and goods, including delivery:

- Names and contact details
- Addresses
- Date of birth
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Health information (including dietary requirements, allergies and health conditions)
- Records of meetings and decisions
- Information relating to compliments or complaints

We also collect or use the following information to provide services and goods, including delivery:

- Racial or ethnic origin
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following information to comply with legal requirements:

- Name
- Contact information

We also collect or use the following information to **comply with legal requirements**:

Sex life information

### Lawful bases

Our lawful bases for collecting or using personal information to **provide services and goods** are:

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- Consent
- Legal obligation
- Vital interests

Our lawful bases for collecting or using personal information for legal requirements are:

- Consent
- Legal obligation
- Vital interests

## Where we get personal information from

- People directly
- Health care providers
- Insurance companies
- Legal and judicial sector organisations
- Third parties, such as Company Employee Assistance Programmes

## How long we keep information

Information Asset	Information Owner Asset	Retention	Trigger for Disposal
Email (including sent items)	Head of organisation	Annual review period every January, although usually actioned quarterly. Any remaining live data untouched until following review period.	End of retention period
Contact details held on mobile devices	Head of organisation	All entries to be deleted upon cessation of therapy.	End of retention period
Recordings	Head of organisation	If part of a training session only, deleted upon award of qualification.	End of retention period
Electronic Diaries	Head of organisation	Annual review every January, 7 years after final treatment session has ended.	End of retention period
Policies	Head of organisation	Until new policy has been put into place	End of retention period
Client records including session notes, initial consultation notes	Head of organisation	7 years after final treatment session has ended.	End of retention period

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Information Asset	Information Owner Asset	Retention	Trigger for Disposal
and client overview form			
Safeguarding records	Head of organisation	In accordance with the current organisation's insurance policy, 7 years after final treatment session has ended, unless superseded by new insurance policy.	End of retention period
Waiting lists	Head of organisation	Monthly review old waiting list destroyed, and new waiting list developed with any remaining live data transferred to new live document.	End of retention period
Continual Professional Development Records	Head of organisation	To be retained when worker is in service.	End of retention period
Worker supervision records	Head of organisation and workers supervisor	To be retained when worker is in service and for 7 years thereafter.	End of retention period
Service evaluation records	Head of organisation	7 years after final treatment session has ended.	End of retention period
Tax returns	Head of organisation	7 years from the end of the financial period to which they pertain to.	End of retention period
Incident/Accident reports	Head of organisation	7 years from date report was closed	End of retention period
Insurance policies	Head of organisation	7 years from date policy ended.	End of retention period
Complaints	Head of organisation	7 years from complaint being resolved	End of retention period
Right to Erasure Request Subject Access Request	Head of Organisation Head of organisation	7 years from request being submitted and completed. 7 years alongside session notes.	End of retention period End of retention period

## **Customer Privacy Notice**

### Who we share information with

Others we share personal information with:

- Insurance companies
- Health care providers
- Organisations we need to share information with for safeguarding reasons
- Professional or legal advisors
- Professional consultants
- Organisations we're legally obliged to share personal information with
- Emergency services (where necessary)

### 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 data.

**Your right to rectification** - You have the right to ask us to rectify personal data 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 data in certain circumstances.

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

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

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

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

#### How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

# **Customer Privacy Notice**

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Company Number (companies House): 14256824

Information Commissioner's Office number: ZA268122

# Last updated

19 July 2024