

This Privacy Policy outlines what data I collect from you, how I use it and how I store it.

Under the General Data Protection Regulations (GDPR) as a sole Practitioner I will assume the roles of both Data Controller and Data Processor, which means that I take full responsibility for collecting my Clients individual data and that I am responsible for managing it and protecting it to the best of my ability.

Please be assured that any information you choose to share with me is completely confidential and is stored by me as securely as it possible for me to do. In my role as Data Controller and Processor I undertake to take all reasonable measures to:-

- Comply with data protection law and follow good practice
- Protect the rights of my Clients
- Inform my Clients about how their personal data is collected, stored and used
- Have a contingency plan in place in the event of a data breach

As a Health Practitioner I confirm that I collect my Clients data for the sole purpose of assessing and understanding their Health and accordingly determining the most effective treatment plans for each Client. I do not share my Clients data with any third parties, (apart from the online tools listed below), *with the exception of where there is compelling evidence to do so by a legal or statutory authority or in the interests of Public Health.*

Website:

You may complete my online contact form, which requires sharing your name and email. I will use this in order to respond to your query and to continue email communication with you as a client. This information is stored securely within my Wix website's Contact Management System and my Gmail email account. Both are password protected and as a company, Wix and Gmail also take precautions to ensure data security. You can find out more here: <https://www.wix.com/about/privacy> and <https://policies.google.com/privacy?hl=en>

Information Forms:

When you book your first consultation with me I email you an information sheet for you to complete and email back to me in advance of your consultation. I ask for your name, phone number, email address and home address – I do this in order to be able to contact you in case I have to rearrange a consultation or notify you of any changes to bookings you may have made with me.

This form also outlines why you are coming to me, a general outline of your health history as well as your family's health history plus a consent section so that you

understand the terms of business that you are agreeing to once you start working with me. I request this information upfront because it enables me to have done some preparatory work on your case before we meet and therefore our time together is more focused and efficient.

Online Consultations:

I currently work with Paypal in order to process online payments via my Wix website. Here is a link to their Privacy

Statement: <https://www.paypal.com/ie/webapps/mpp/ua/privacy-full>.

I also currently use Zoom to conduct online consultations. I do not record our consultations unless I have obtained the permission of the Client involved, therefore I do not store any recordings. The only record I hold is my handwritten notes of the consultation which are stored in my Clients case notes in a locked filing cabinet within my office which is also locked when I am not present. Here is a link to Zoom's privacy policy: <https://zoom.us/privacy>

Case notes:-

I take notes during your consultations with me either in person, online or by telephone for the purposes of record so that I can refer to your notes to clarify details, monitor progress and to have a complete record of every aspect of your health. This is how Homeopathic remedies are prescribed and having this data is a necessary part of my job.

Your case file is kept in a locked filing cabinet in my Clinic room which is also locked and the only key is held by me. Your case file is never removed from my Clinic unless you have requested a Home visit or are attending my clinic at Brenchley.

I am obliged by law to keep your case notes on file for a period of 7 years from the time of your last consultation with me. In the case of Minors (under 16), I am obliged to keep records until they reach 18 and then for a further 7 years). I keep a summary of all consultations with clients with details of why you have consulted with me & the date, the prescription given & why it has been given, the follow up date and the cost of the consultation. You may request copies of these summary sheets at any time during the period that your records are being held by me and I will supply them within 14 days.

I may ask to take a photo or for you to provide me with a photographic record of particular complaints in order to monitor changes, eg skin disorders or for the sake of identification purposes. These photos will be either printed within a 28 day period and added to your case file and the digital form either stored on my laptop in a password protected file or deleted, whichever you request.

Social Media:

My policy is, where ever possible, to conduct any communications made to me that include any personal details, via my business email gillsugrue.homeopath@gmail.com. I cannot be responsible for the confidentiality of messages via any social media platform so I must point out that this form of communication is at your discretion and is your responsibility. To the best of my knowledge [Facebook](#) and [Instagram](#) are GDPR compliant. Members of my Closed Facebook support group are to be guided by the pinned post at the top of the group page and can be assured that because the group is a 'Closed Group' although it will appear in searches and the membership list is public, all conversations conducted within it are private and therefore can only be seen by other members of the group and the Admin team. You may leave the group at any time.

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My handwritten case notes:-

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Your right to update, correct or delete your data:

If at any time you think that I am storing incorrect information about you or you wish to update, revise or have deleted any of your details, please apply to me in writing.

Your application must be signed by you and I may ask for further identification before any further action. Once I have verified your request, I will action it within 14 days.

I have the right to refuse your application to delete in the following situations:-

- I need to comply with a legal obligation for the performance of a public interest task or exercise of Legal authority
- For Public Health purposes in the Public interest
- The exercise or defence of Legal claims

In the event of a data breach:-

- I will notify all Clients affected immediately
- I will take all appropriate steps to minimise any damage
- I will change all relevant passwords and secure any affected accounts.
- If applicable I will inform the [Data Protection Commissioner](#)

Please contact me at gillsugrue.homeopath@gmail.com if you have any queries regarding this policy.