



acuspace
your path to health

Privacy Notice

May 2018

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1.0 For clients / acupuncture patients:

This notice is to explain why I, Emily Lowe, owner of acuspace, collect your personal data, and what I do with it. It is also to ensure that I am working in accordance with the new EU General Data Protection Regulation (GDPR); terms from the regulation are indicated in bold.

When you supply your personal details to me, when I communicate by email, and when I take notes in the clinic, this information is stored and processed for four reasons in line with the GDPR requirements:

1. I need to collect personal information about your health in order to provide you with the best possible treatment. Your request for treatment and my agreement to provide that care constitutes a **contract**. You can, of course, refuse to provide the information, but if you were to do that I would not be able to provide treatment.
2. I have a **legitimate interest** in collecting that information, because without it I can't practice acupuncture effectively and safely.
3. I keep records of your contact information because it is important that I can contact you in order to confirm your appointments with me or to update you on matters related to your medical care. This again constitutes a **legitimate interest**, but this time it is your legitimate interest.
4. Provided I have your **consent** (and this only needs to be verbal consent), I may occasionally send you individualised health information by email in the form of articles or advice. I will never send out generalised leaflets or advertisements. You may withdraw consent for me to contact you about individualised health information at any time – just let me know by any convenient method.



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I have a **professional obligation** to retain your records for 8 years after your most recent appointment (or after you have reached age 25, if this is longer), but after this period you can ask us to delete your records if you wish. Otherwise, we will retain your records indefinitely in order that we can provide you with the best possible care should you need to see us at some future date.

If you are a patient at ML Chiropractic*, your clinical records are stored:

- On paper, in locked filing cabinets, and the offices are always locked and alarmed out of working hours.
- Electronically (“in the cloud”), using a specialist medical records service. This provider has given us their assurances that they are fully compliant with the General Data Protection Regulations. Access to this data is password protected, and the passwords are changed regularly.
- On the office computers. These are password-protected, backed up regularly, and the office(s) are locked and alarmed out of working hours.

If you are a private client with me where I attend your home for treatment, your clinical records are stored on paper only, in individual files, and in a secure, locked cabinet within my home office.

I also keep a file on my password protected computer at home which stores the invoices which I send out to those people who pay by bank transfer. These invoices mostly record dates of acupuncture appointments and names of clients. Some record addresses of clients only if requested by the client for the purposes of claiming clinic fees on insurance. These documents are not seen by accountants and are purely for personal financial record keeping.

I am the only person who has access to your records, invoice files and emails. I will never share your information with anyone who does not have a legal right of access without your written consent.

If you attend ML Chiropractic, only the following people/agencies, other than myself, will have routine access to your data:

- The medical records service who store and process their files

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- The reception staff, because they organise my diary and coordinate appointments and reminders (but they do not have access to your medical history or sensitive personal information)
- Other administrative staff, such as their bookkeeper. Again, administrative staff will not have access to your medical notes, just your essential contact details.
- They also use Mailchimp to coordinate their messages, so your name and email address may be saved on their server.
- From time to time, they may have to employ consultants to perform tasks which might give them access to your personal data (but not your medical notes). They have agreed that they will ensure that said consultants are fully aware that they must treat that information as confidential, and they will ensure that said consultants sign a non-disclosure agreement.

You have the right to see what personal data of yours I hold, and you can also ask me to correct any factual errors. I am legally required to respond to any request from a client to see their personal data within a timescale of 30 days. However, I would ensure that I responded as soon as I possibly could to any reasonable request for access to personal records.

I want you to be absolutely confident that I am treating your personal data responsibly, and that I will do everything I can to make sure that the only people who can access that data have a genuine need to do so. In the case of my practice this would most likely apply in the situation of me needing to make a referral to another health professional.

Of course, if you feel that I am mishandling your personal data in some way, you have the right to complain. Please first raise your concern with me, the Data Controller for acuspace, as I hope very much I will be able deal with any concerns you might have. However, you can also raise a concern directly with the Information Commissioner's Office on <https://ico.org.uk/concerns/>

*ML Chiropractic, 604 Fulham Road, London SW6 5RP

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2.0 For newsletter subscribers:

This notice is to explain why I, Emily Lowe, owner of acuspace.co.uk, collect your “personal details” (in this instance, namely your first name, last name and email address) and what I do with it. It is also to ensure that I am working in accordance with the new EU General Data Protection Regulation (GDPR); terms from the regulation are indicated in bold.

Please note that if you are my acupuncture client, I never add you to my newsletter unless you expressly ask me to do so.

When you supply your “personal details” to me and when I communicate with you by email using MailChimp, this information is stored and processed for three reasons in line with the GDPR requirements:

1. I need to collect personal details in order to communicate with you. Your request to sign up to my newsletter through my website, via email or verbal request constitutes a **contract**. You can, of course, refuse to provide the information, but if you were to do that I would not be able to contact you.
2. I keep records of your contact information in order that I can contact you. This constitutes a **legitimate interest**, but this is your legitimate interest.
3. Provided I have your **consent** (by you confirming your desire to be on my MailChimp newsletter subscription list using ‘[double opt-in](#)’), I will occasionally send you information about my clinic, my services, interesting news, articles or health information. You may withdraw consent for me to contact you health information at any time – just let me know by any convenient method (e.g. via email to emily@acuspace.co.uk) or use the unsubscribe details at the bottom of any email communications I send to you.

I will never share your data with anyone else.

Your data is stored on the MailChimp server only, in the cloud, not on my personal computer.

The account is password protected and only I have access to the account.

MailChimp has annually certified their agreement to EU/US and Swiss Safe Harbor Frameworks since 2007.

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Since the Safe Harbor Frameworks have been replaced by the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, they have certified their agreement with these Privacy Shield Frameworks. You can see their [Privacy Policy](#) for more details.

You have the right to see what personal data of yours I hold, and you can also ask me to correct any factual errors. I am legally required to respond to any request from a client to see their personal data within a timescale of 30 days. However, I would ensure that I responded as soon as I possibly could to any reasonable request for access to personal records.

As with the personal and medical data I hold for my acupuncture clients, I want you to be absolutely confident that I am treating your personal data responsibly, and that I will do everything I can to make sure that the only people who can access that data have a genuine, legal need to do so.

Of course, if you feel that I am mishandling your personal data in some way, you have the right to complain. Please first raise your concern with me, the Data Controller for acuspace, as I hope very much I will be able deal with any concerns you might have. However, you can also raise a concern directly with the Information Commissioner's Office on <https://ico.org.uk/concerns/>