



## David Clyant, Practitioner of Traditional Chinese Medicine Privacy Policy - 24 May 2018

As a professional practitioner David is committed to protecting and respecting your privacy. Your privacy is taken very seriously and it is important that you read this Privacy Policy carefully as it contains information on:

- The personal data collected about you
- How your personal data is looked after when you visit my website (regardless of how you visit from)
- With whom your personal data might be shared
- Your privacy rights and how the law protects you.

### Personal Data Collected

Personal data is collected about you when you:

- Book an appointment, either directly or through one of the clinics that David practices at
- Follow through with the appointment when health history and data is collected
- Purchase or make payments for any treatments
- Make Contact through my website
- Complete any feedback

The personal data collected in the above manner may include your:

- Full name
- Postal address
- Email address
- Telephone number
- Next of Kin contact information
- Initial Health information regarding the treatment that is required
- On-going health information that is revealed through subsequent treatments
- Copies of any relevant documentation provided by you, e.g. medical procedure results

The lawful basis for the collection and processing of your personal data is your **consent**.

### Personal data provided by 3rd parties

David Clyant does not receive information about you from other sources, unless you are referred by another practitioner. In this case consent is sought from you before any information is requested from your referring therapist.

### Special categories of personal data

David Clyant does hold special category personal data about you. David collects and processes special category data (health information) about his patients, with their consent (lawful processing requirement) under the condition of vital interests (condition requirement). This health information and next of kin details are kept so that David can ensure the safety of his patients during treatments and in the event of an emergency and also hold an emergency contact for such circumstances. This data is gathered with the patient's explicit consent.

## Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his/her personal data
- Receive on his/her behalf any data protection notices
- Give consent to transfer his/her personal data outside the European Economic area
- Give consent to the processing of their special category personal data (further details relating to special category personal data is detailed below).

## How Your Personal Data is Used

David collects information about you so that he can:

- Provide you with an accurate and effective treatment be it acupuncture, tui na or herbs
- Send herbal formulae via the post if required
- Contact you if a scheduled appointment needs to be changed
- Provide you with an invoice if required to claim fees from a relevant insurance company

David Clyant does not perform any patient profiling or analysis of preferences.

## Marketing

Occasionally I would like to send you information by email about my products and services, offers, courses and classes which may be of interest to you. I will only send you marketing messages when you click to subscribe on our website or tick the relevant consent box when you provide me with your personal data. If you have consented to receive such marketing you can opt out at any time by contacting David via email.

## When Your Personal Data May Be Shared With Third Parties

Your personal data may be shared with other therapists only when you give your explicit consent to do so, e.g. referring you to another practitioner. I do not and will not otherwise sell or give any of your personal data to any third party – including your name, address, email address or payment information. In order to earn and maintain your trust this is essential.

There may be situations where by law and statute I may have to share your information with law enforcement agencies in connection with any investigation to help prevent unlawful activity.

## How You Give Your Consent

In those cases where I need your consent to hold and process your personal data, I will ask you to check a box and/or sign a form requiring consent. By checking these boxes you are confirming that you have been informed as to why I am collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what are your rights as a data subject (all of which is set out in this Privacy Policy). David will hold your data for the options you provide consent to.

## How Your Data is Kept Secure

To protect your information I have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place.

- I store backups of your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall
- I store your personal data on secure devices
- To make sure that these measures are suitable, we run vulnerability tests regularly

## How Long Is Your Personal Data Kept

I shall only retain your information for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

As a general rule, patient details are kept on the database for the duration of treatment and for 7 years following the last treatment, following which these are securely and permanently deleted (electronic and paper records).

## Transfer Of Your Personal Data Out Of The EEA

All information you provide via our website is stored on our secure servers within the European Economic Area (“EEA”). If, in future, any data that I collect from you is transferred to, or stored at, a destination outside the EEA at any time, I will update this Privacy Policy accordingly. When you link to a social media site via our website, any personal data which you provide them may be transferred or stored outside the EEA. Please check their websites’ privacy notice and policy carefully.

## Your Rights

At any point you can contact me to request the information I hold about you as well as why I have that information, who has access to the information and where I got the information. Once I have received your request I will respond within 30 days.

If the information I hold about you is out of date, incomplete or incorrect, you can inform me and I will ensure that it is updated.

If you feel that I should no longer be using your information you can request that I erase the information I hold. When I receive your request, I will confirm when the information has been deleted or tell you the reason why it cannot be deleted.

You have the right to request that I stop processing your information. Upon receiving the request, I will contact you to tell you if am able to comply or if I have legitimate grounds to continue. If data is no longer processed, I may continue to hold your information to comply with your other rights.

You have the right to request that I stop contacting you with direct marketing.

You have the right to request that I transfer your information to another controller. Once I have received your request, we will comply where it is feasible to do so. David does not conduct any automated decision making and/ or profiling. For your security I may need to verify your identity before processing your instructions above.

## Cookies And Tracking

### Use of cookies

A cookie is a small text file which is placed onto your device when you access my website. I use cookies on my website to make your online experience more efficient and enjoyable. In most cases I will need your consent in order to use cookies on the website. The exception is where the cookie is essential in order to provide you with a product or service you have requested.

### Consent to cookies

If you visit my website when your browser is set to accept cookies, the site will interpret this as an indication that you consent to the use of cookies and other similar technologies as described in this Privacy Notice and Policy. If you change your mind in the future about letting the use of cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

### Turning off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner’s webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.

## Social Media Sites

### TAKE CARE WHEN LINKING TO THE SOCIAL MEDIA SITES

The website provides links to my social media sites. Once on any of these social media sites, please

take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please the sites' privacy notice and policy carefully.

## Making Contact

If you have any queries about this Privacy Notice and Policy, need further information about how your personal data is managed or wish to lodge a complaint, please contact David by any of the following means:

- Email: <mailto:david.clyant@gmail.com>
- Contact us using our "Contact us" page on the website.

You also have the right to lodge a complaint with the Information Commissioner's Office directly. Further information, including contact details, is available at <https://ico.org.uk>.

## Changes To This Privacy Policy

David may change this Privacy Policy Notice from time to time. You should check this Privacy Policy Notice occasionally to ensure that you are aware of the most recent version that will apply each time you access our website. Where any changes have been made to this Privacy Policy which affects the manner in which your personal data is handled, I will contact you by email where possible to inform you of this change. This Privacy Policy Notice was last updated on 24 May 2018 on behalf of David Clyant BSc MAcuC MCNHC, Practitioner of Traditional Chinese Medicine.

Reference: <https://ico.org.uk/for-organisations/>

## Responsibility Statement

The information contained in this Policy represents my interpretation of the law as at the date of this edition. David takes all reasonable care to ensure that the information contained in this Policy is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed. However, before taking any action based on the contents of this Policy, readers are advised to confirm the up to date position and to consult the ICO on the reference, or relevant country authority for members outside the UK, regarding their individual circumstances. If you have any queries, questions or comments on the information contained in this policy, kindly contact [david.clyant@gmail.com](mailto:david.clyant@gmail.com)