

# THE PLANE TREE, LONDON E2

## GDPR 2018 PRIVACY NOTICE



### Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) that is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**1 – The Plane Tree**, based at **31 Roman Road, London, E2 0HU**, which hereafter for the purposes of this Privacy Notice will be referred to as The Plane Tree, is pleased to provide the following information:

### 2 - Who we are

The Plane Tree is a private complementary health clinic providing manual and talking therapies by qualified and insured practitioners. Our therapists operate on a self-employed basis. We collect only the information required for you to make appointments with them. The therapist is responsible for gathering and storing any personal medical information they require as part of a case-history taking and on-going therapeutic relationship. The therapist holds responsibility for handling this medical information according to the GDPR guidelines. The Plane Tree will not have access to your patient records unless the staff involved has signed an integrity and confidentiality agreement with the therapist responsible for your care, and you consented to this on your data protection consent form provided by your therapist. Their access to your notes under these circumstances will be limited to identifying information sufficient only for handling and filing purposes.

### 3 - Personal Data

- a) For the purposes of arranging treatment with one of our team of therapists, The Plane Tree will only collect information that is relevant and necessary. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff that have all signed an integrity and confidentiality agreement. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment.
- b) The Plane Tree may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you. We do not currently use information gathered through our reception to market our services to you unless you have expressly requested that we do so.
- c) In making initial contact with the practice you consent to The Plane Tree maintaining a dialogue with you until you either opt out (which you can do at any time) or we decide to desist in providing our services. We do not currently maintain a marketing database.
- d) The Plane Tree's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. The Plane Tree's website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using The Plane Tree's website.
- f) The Plane Tree will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

### 4 - Legal basis for processing any personal data

Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

### 5 - Legitimate interests pursued by The Plane Tree

To promote treatments for patients with all types of health problems indicated for care within the scope offered by our self-employed therapists.

### 6 – Consent

Through agreeing to this privacy notice you are consenting to The Plane Tree processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.

### 7 – Disclosure

The Plane Tree will keep your personal information safe and secure. Our administration team will have access to your contact details so that they can make appointments. This will only be provided to therapists engaged in providing your treatment or other therapists on your request. The Plane Tree will not have access to your patient records unless the staff member has previously signed an integrity and confidentiality agreement with the therapist responsible for your care. The Plane Tree will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The Plane Tree may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

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### 8 - Retention Policy

The Plane Tree will process personal data during the duration of any treatment and will continue to store only the personal data that was required for arranging your booking.

### 9 - Data storage

All Data is held in the United Kingdom. The Plane Tree does not store personal data outside the EEA.

### 10 - Your rights as a data subject

At any point whilst The Plane Tree are in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that The Plane Tree refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request The Plane Tree can confirm what information it holds about you and how it is processed.

### 11 - You can request the following information:

- Identity and the contact details of the person or organisation (The Plane Tree) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of The Plane Tree and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### 12 - To access what personal data is held, identification will be required

The Plane Tree will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If The Plane Tree is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to [johnplanetreelondon@gmail.com](mailto:johnplanetreelondon@gmail.com) or by phoning +44 (0)203 022 5892 or writing to us at the address further below.

### 13 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by The Plane Tree you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

**John Mallinder, The Plane Tree, 31 Roman Road, London, E2 0HU**

Telephone +44 (0)203 022 5892 or email: [johnplanetreelondon@gmail.com](mailto:johnplanetreelondon@gmail.com)

### ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>