

CLIENT PRIVACY POLICY



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

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain
- Website & Cookies

Contact Details

Email: hello@juniper-therapies.com

What information we collect, use, and why

We may collect or use the following information **to provide patient care and services:**

- Name, address and contact details
- Gender
- Pronoun preferences
- Date of birth
- Emergency contact details
- Health information (such as medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Photographs [acupuncture only]

We also may collect the following special category information **to provide patient care and services**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Health information
- Sex life information
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details

We also collect the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

Any information collected is with your consent and at your discretion. We will never obtain information that you haven't given us explicit permission to have.

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** – You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** – You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.

- **Your right to erasure** – You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** – You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** – You have the right to object to the processing of your personal data.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month. Please be aware that in order to operate our practices we are also bound by the terms and conditions as set out by the insurance companies we are registered with, and this may impact how we are able respond to your requests. Where possible we will make you aware of this in our response to your request.

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

Our lawful bases for the collection and use of your data

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

- **Consent** – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.
- **Vital interests** – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or

serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information **for dealing with queries, complaints or claims** are:

- **Consent** – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Where we get personal information from

- Directly from you
- Through a third-party referral

How long we keep information

We store your information for 5 years from the time you end treatment, as part of our obligations through our registered bodies and our insurance policies. We will destroy any and all records after this time in line with GDPR law.

Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied.

When you agree to receive treatment, one of the exceptions to duty of confidentiality will be that your practitioner may share anonymised information about you in professional supervision. If you have any questions about this please make the relevant practitioner aware as soon as possible.

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:

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>