

1. Overview

The National Centre for Integrative Medicine (NCIM) is the 'controller' of personal data for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation. NCIM may be contacted at Rodney House, Portland Street, Clifton, Bristol BS8 4AL. NCIM may also act as a processor of personal data on behalf of partner organisations.

NCIM takes your confidentiality and privacy rights very seriously and we are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper.

This Privacy Notice explains the reasons we collect personal data and what we do with it. This privacy notice applies to all the different groups of people we process personal information about, i.e. not just patients and service users (see below).

We want you to be confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

If you feel that we are mishandling your personal data in some way, you have the right to complain. Complaints need to be sent to our Data Protection Officer, Kirsten van den Hout, Business Development and Operations Manager, Kirsten.vdh@ncim.org.uk

If you are not satisfied with our response you can raise the matter with the Information Commissioner's Office.

NCIM is registered with the ICO: ZA142503

2. What kind of data we collect and why

We process personal information about:

- patients and service users
 - integrative medicine diploma and homeopathy programme students
 - employees and job applicants
 - suppliers
 - professional associates, advisers and consultants
- We may process the following types of personal data:
- **Identity data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender
 - **Contact data** may include your address, email address and telephone numbers
 - **Medical information** - notes and reports about your physical or mental health and any treatment, care or support you need and receive from us
 - **Profile data** may include your feedback and survey responses

- **Marketing and communications data** may include your preferences in receiving marketing communications from us
- **Financial data** may include your bank account and payment card details
- **Technical data** may include your login data, internet protocol addresses, browser details, browser plug-in details, time zone setting and location, operating system and platform and other technology on the devices you use to access our website
- **Usage data** may include information about how you use our website
We use your data for the primary goal of delivering our health and wellbeing services. Like many organisations, processing data is critical for the day-to-day operations of our business.
We may also process **sensitive personal data**, for example, health records or criminal records of staff for safeguarding reasons. We require your explicit consent for processing sensitive data, so when you submit your details, we will ask for your explicit agreement in providing this information to us.

3. How we store and protect your data

We will never share your data with anyone who does not need access without your written consent.

Your records may be stored:

- On paper, in locked filing cabinets. Our offices are always locked out of working hours
- Patients and service users: electronically using a specialist online medical records service (PracticePal)
- Employees, associates and contractors: electronically on our cloud-based administrative and financial management systems (Office 365 and Xero)

Only the following people/agencies will have routine access to your data:

- The medical records service (PracticePal) which stores patient and service user data
- Therapists and practitioner(s) in order that they can provide patients and service users with treatment
- Our administration staff in order to organise our practitioners' diaries, and coordinate appointments
- Other staff, such as our finance team, who will not have access to medical notes, just essential contact details to manage invoices and payments
- Mailchimp is used to manage our newsletters and other promotional emails, so your name and email address may be saved on its server

From time to time, we may have to employ consultants to perform tasks which might give them access to personal data (but not medical notes). We will ensure that they are fully

aware that they must treat that information as confidential, and we will ensure that they sign a non-disclosure agreement.

Access to online data is password protected, and the passwords are changed regularly on our office computers, which are also password-protected.

We educate all staff on data protection at induction, and in staff meetings and workshops.

4. The legal grounds for using your data

There are several rules that guide how we use your data:

Basis	Notes
Contract	We need to collect personal information about the health of patients and service users to provide the best possible treatment. Requests for treatment and our agreement to provide that care constitutes a 'contract'. Patients and service users can refuse to provide the information, but we can't provide any treatment without it.
Legitimate Interest	We have a 'legitimate interest' in collecting personal information so we can do our job effectively and safely. We also need to contact patients and service users to confirm appointments with us or to update you on matters related to their medical care.
Consent	As long as we have your consent, we may occasionally send our general health information in the form of articles, advice or newsletters. Individuals may withdraw this consent at any time, usually by 'unsubscribe' from our emails.
Legal Obligation	We collect personal data about employees, contractors, associates and suppliers to formally engage their professional services. If you enter into a financial agreement with us certain personal information will need to be kept.

5. How long we hold your data for

We have varied retention periods for each type of data we process but will always try to limit the length of time we hold your data.

Reason	Example	Retention Period
Statutory	Information on staff	Data on ex-employees will be kept for six years (from the end of employment)
Contractual	Applications for funding	Length of time specified in contract
Administrative	Email enquiries to helpline	No longer than necessary for the purposes we obtained it for
Medical	Patient data	Minimum eight years*

* There is no single retention period which applies to all medical records. We aim to comply with the Records Management Code of Practice for Health and Social Care 2016. In general, medical records are retained for eight years from data of discharge or end of care but some may be kept longer than that e.g. if there has been a serious incident. After this period, you can ask us to delete 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.

6. Sharing your data

We may disclose information about patients and services users to their general practitioner or hospital consultant for treatment purposes. We may also disclose information about individuals to our employees, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out in this privacy policy.

The National Centre for Integrative Medicine shares the names of patients and service users with the organisations from which we rent our practice and treatment rooms. We need to do so to advise the reception about our appointment lists. We don't share any other information about you without your consent.

We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing.

7. Marketing and website 'cookies'

We want to promote our services, resources and news with you. We do this in the following ways:

- Emailing website visitors who consent to our email marketing
 - Emailing people who we believe may be interested in hearing about our services
 - Promoting our services to our 'followers' across social media platforms
- You can unsubscribe from our updates at any time or choose what information you want to receive.

We use cookies to track the use of our website. We do this in order to monitor and improve the user experience through Google Analytics.

A cookie consists of information sent by a web server to a web browser and stored by the browser. In most browsers, you can block all cookies (go to internet options/privacy). Blocking all cookies will, however, have a negative impact upon the usability of many websites.

8. Your rights as a data subject

If we hold your personal data you have rights outlined by General Data Protection Regulation and the Data Protection Act 1998/2018:

- You have the **right to be informed** about the collection and use of your personal data when it is obtained
- You have the **right to be forgotten** i.e. for us to no longer store your information. However, there are instances such as statutory/contractual agreements which mean we may have to keep hold of some details
- You have the **right to ask for a subject access request**. This means you can ask us for all the information we hold on you and we are obliged to provide this to you in a portable format by one month (30 days). Please note that requests deemed as 'excessive' can be denied or charged for. To make a subject access request please contact our Data Protection Officer (see above).
- You have the **right to complain to the ICO** if you believe your personal data is compromised in any way.

Last Updated 10 October 2018