

Brain and Body Connection

Customer Privacy Notice

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

Contact details

Telephone: +44 (0)7847 114423

Email: beckie@brainandbodyconnection.co.uk

What information we collect, use, and why

We collect or use the following personal information **to comply with legal requirements:**

- Name
- Contact information
- Any other personal information required to comply with legal obligations

We collect or use the following personal information **for information updates, marketing or market research purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information
- Records of consent, where appropriate
- Information relating to the national data opt-out

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

- Names and contact details
- Addresses

- Correspondence

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

We collect or use the following personal information to **provide best care for clients with regards to their wellbeing**:

- Name, address and contact details
- Gender
- Pronoun preferences
- Date of birth
- Photographs
- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, dietary requirements and general care provisions)
- Payment details (including card or bank information for transfers and direct debits)
- Records of meetings and decisions
- Administration information (including treatment schedules and admission and discharge information)
- Records of consent, where appropriate
- Information relating to the national data opt-out

We also collect the following special category information to **provide best care for clients with regards to their wellbeing**. This information is subject to additional protection due to its sensitive nature:

- Health information

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. [Read more about the right of access](#).

- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](#).
- **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. [Read more about the right to data portability](#).
- **Your right to withdraw consent** - When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent](#).

If you make a request, we must respond to you without undue delay and in any event within one month.

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 comply with legal requirements** 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.
- **Legal obligation** - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

- **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. Our legitimate interests are:
 - To enable best care with regards to each client's safety and well-being. To ascertain each individual's stage of development and/or circumstances that may be contra-indicated to some services or products.
 - Insurance purposes. Client records need to be held for the length of time stipulated by the insurance company.
 - For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.
- **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.

Our lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** 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.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **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. Our legitimate interests are:
 - To keep the client informed of updates and information beneficial to them.
 - For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.
- **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.

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.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **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. Our legitimate interests are:
 - Contact information and to enable best care with regards to each client's safety and well-being. To ascertain each individual's stage of development and\or circumstances that may be contra-indicated to some services or products.
 - For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.
- **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.

Our lawful bases for collecting or using personal information **Provide best care for clients with regards to their wellbeing** 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.

- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **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. Our legitimate interests are:
 - To enable best care with regards to each client's safety and well-being. To ascertain each individual's stage of development and/or circumstances that may be contra-indicated to some services or products.
 - For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.
- **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.

Where we get personal information from

- Directly from you
- Family members or carers

How long we keep information

Minimum Retention: 7 years for adults; 7 years after turning 18 for minors.

Content: Full records of treatments, advice, consent, and, in some cases, rationale for treatment.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

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; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the **Public Benefit and Privacy Panel for Health and Social Care** or other similar governance and scrutiny process.

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>