

## Privacy Policy Claire Mullan – Medical Herbalist and the business Hedgerow Hippy.

You have the right to request access to the data I hold about you. You also have the right to request rectification of the data I hold about you. I will respond to such requests within one month of receiving them.

Claire Mullan is the Data Protection Officer, acting as both processor and controller. Requests for access to and control of data should be made verbally to me in person or by telephone 07738 874 320, in writing addressed to Claire Mullan at 2A Drummond Street, Muthill, PH5 2AN or by email to hedgerowhippy@gmail.com

In the event of my death, arrangements have been made for the secure disposal of your data.

Your data is processed under one or more of the following categories:

### Category: Health Consultation Records

**Lawful Basis:** Legal obligation. Special data protection category (h)

#### Processing and control of data:

- Records are kept in hard copy not digital
- Records are stored securely locked both at home and in transit
- Electronic communications (email, text, other messaging services)
  - Will be printed or transcribed and stored securely with your notes.
  - The original communication will then be deleted.
  - All devices and accounts are password protected.
- Your Health Records will not be disclosed to any third party unless:
  - I have your explicit consent to do so
  - I am legally obliged to do so
  - I consider you to be in immediate danger
  - I consider you to be a danger to yourself and/or others.
- Notes will be kept for the duration of your lifetime plus 3 years in accordance with NHS Scotland practice.

### Category: Health Consultation Enquiry

**Lawful Basis:** Contract. Special data protection category (h)

#### Processing and control of data:

- Kept in hard copy not digital
- Stored securely locked both at home and in transit
- Electronic communications (email, text, other messaging services)
  - printed or transcribed and stored securely with your notes.
  - The original communication is then deleted.
  - All devices and accounts are password protected.
- These notes will not be disclosed to any third party unless:
  - I have your explicit consent to do so
  - I am legally obliged to do so
  - I consider you to be in immediate danger
  - I consider you to be a danger to yourself and/or others.

- If no further communication is received the record will be destroyed after one year.
- At any point within that year, you can ask for these notes to be destroyed.
- If a consultation is booked, these notes will be treated as health records and processed accordingly.

**Category:** All enquiries except for Health Consultations

**Lawful Basis:** Contract

**Processing and control of data:**

- Enquiries and contact details will be stored securely.
- Contact details will only be used for the purpose of communicating with regard to the enquiry.
- If no further communication is received the record will be destroyed after one year.
- At any point within that year, you can ask for these notes to be destroyed.
- If a booking is made, these notes will be treated as booking records and processed accordingly.

**Category:** All bookings except Health Consultations

**Lawful Basis:** Contract

**Processing and control of data:**

- Booking information will be stored securely.
- Payment details will be kept for accounting and tax purposes.
- Card details will be destroyed immediately after use.
- Contact details will only be used for the purpose of delivering and communicating with regard to the contract.
- Retention of records will be reviewed on an annual basis.
- Where third party services are used, these will be vetted for data regulation compliance and you will be advised.

**Category:** Direct Marketing

**Lawful Basis:** Consent

**Processing and control of data:**

- Contact details will be kept in a separate marketing database, subject to explicit consent to process your information for this purpose.
- Records will be kept of how and when this consent is received.
- Consents will be reviewed and refreshed at appropriate intervals.
- Electronic records will be stored in a password protected document.
- Paper records will be stored in a secure environment.
- You can ask to be removed from this list at any time.
- Where third party services are used, these will be vetted for data regulation compliance and you will be advised.