



North Wales Neuropsychology Services

**DATA
PROTECTION &
PRIVACY POLICY**

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1. Introduction and Policy Statement:

North Wales Neuropsychology Services (NWWS) aims to be as clear as possible about how and why we use information about you so that you can be confident that your privacy is protected.

This policy describes the information that NWNS collects when you use our services. This information includes personal information as defined in the General Data Protection Regulation (GDPR) 2016.

The policy describes how we manage your information when you use our services, if you contact us or when we contact you. It also provides extra details to accompany specific statements about privacy that you may see when you use our website (such as cookies). In respect of cookies the policy includes information about the type of cookies that we use and how you may disable those cookies.

NWNS uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, NWNS is the data controller; if another party has access to your data we will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why we need to provide them with the information.

2. Scope:

The policy applies to all staff working within NWNS. This includes associates, students, volunteers and individuals from other organisations working on NWNS premises.

3. Aims:

The aim of this policy is to ensure that all staff, associates, students, volunteers within NWNS and individuals from other organisations working on NWNS premises are aware of their responsibilities under the General Data Protection Regulation (GDPR) 2016.

4. Why do we need to collect your personal data?

NWNS needs to collect information about you so that we can:

- Know who you are so that we can communicate with you in a personal way. The legal basis for this is a legitimate interest.
- Deliver services to you. The legal basis for this is the contract with you.
- Process your payment for the services. The legal basis for this is the contract with you.

- Verify your identity so that we can be sure we are dealing with the right person. The legal basis for this is a legitimate interest.
- Contact you in case there is a problem with the services that you have requested. The legal basis for this is legitimate interest.
- Optimise your experience on our website. The legal basis for this is a legitimate interest.
- Send you information about our services. The legal basis for this is your consent.
- Provide you with a useful and relevant website. The legal basis for this is legitimate interest.

5. What personal information do we collect and when do we collect it?

For NWNS to provide you with our services as requested by you, we need to collect the following information:

- Your Name
- Your contact details including a postal address, telephone number(s) and electronic contact such as e-mail address.
- Your Date of Birth
- Your Next of Kin
- Your GP
- Detailed case notes
- Details about how you access our website such as the IP address, the browser you use and which pages you access.

We collect this information directly from you.

We may also collect information about you from third parties; for example if we need to gather information from another health professional (such as your GP) to provide a complete assessment.

On our website, we use cookies to gather information about visitors which we use only to enhance your online experience. We do not identify you or any other individual from this information (see section below for more information on how we use cookies). Similarly, we log the IP address of any user visiting the website; again, this is not used to develop a personal profile on you, it is used to ensure our website is providing useful and relevant information to anyone who uses it.

6. How do we use the information that we collect?

We use the data we collect from you in the following ways:

- To communicate with you so that we can inform you about your appointments with us; we use your name and your contact details such as your telephone number, e-mail address or postal address.
- To deliver the correct service requested by you; we use your name, your contact details, your date of birth, your next of kin, your GP, detailed case notes and the details about the services requested.
- To create your invoice; we use your name and e-mail address.
- To optimise our website so that users can find the information they need.

7. Where do we keep the information?

NWNS keeps your information as described below:

7.1. On our company computers

We use personal computers that are located on our business premises and company laptops. The computers and laptops are password protected and it is company policy that passwords are not shared. We do not use cloud service to store your data.

7.2 Client Folder (Electronic and Paper)

We use Microsoft Word, Excel and PDF which are computer programmes that stores the information on a computer in our office and on company laptops. The client folders includes terms and conditions, contracts, invoices, receipts, appointment letters, reports, relevant e-mail correspondence. Paper copies are kept in a locked filing cabinet.

7.3 Reports (Electronic and Paper)

We create reports that contains all the information that we gather and our findings and conclusions. These are stored electronically on our company computers and laptops and paper copies are stored in a locked filing cabinet.

7.4 Paper Copies

We take hand written case notes when we meet you. These notes are used to create the report that we provide to you and details about the process of the service. These are stored in a locked filing cabinet.

We keep a paper copy of your invoice in a locked cabinet and we send this copy to our accountant at the end of each financial year.

8. How long do we keep the information?

NWNS will hold your personal information for as long as is necessary for the purpose set out above and will remove it when the purposes have been met.

Enquiry data / potential client data will be retained for 3 months. After 3 months it will be deleted and confidentially shredded using a secure shredding service.

Client records/folders will be retained for the following duration as per Statute of Limitations:

- Adults: 7 years
- Vulnerable Adults: Indefinite
- Children: 7 years after 18th Birthday

After this they will be deleted and confidentially shredded using a secure shredding service.

Paper and electronic copies of invoices will be retained for 7 years. The accountant keeps the paper copy for a maximum of 6 months whilst doing the accounts. These are then returned and stored in a locked cabinet.

9. Who do we send the information to?

We send your report to you and anyone we are required by law to inform. All reports that are sent electronically are sent as attachments that are encrypted and password protected.

We send the paper copies of our invoices to our accountant. The accountant is based in the UK and all their computer systems are in the UK.

10. How can you see all the information we have about you?

You can make a subject access request (SAR) by contacting the Data Protection Officer, North Wales Neuropsychology Services, Unit 1c Ash Court, Ffordd Y Llyn, Parc Menai, Bangor, Gwynedd, LL57 4DF. A charge of £10 administration fee will be made to process the request.

We will require additional verification that you are who you say you are to process this request.

We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your vital interests

11. What if your information is incorrect?

Please contact the Data Protection Officer at the address specified above in section 10. We may require additional verification that you are who you say you are to process this request.

If you wish to have your information corrected, you must provide us with the correct data and after we have corrected the data in our systems we will send you a copy of the updated information in the same format as the subject access request in section 10.

12. How can you have your information removed?

Please contact the Data Protection Officer at the address specified above in section 10. We may require additional verification that you are who you say you are to process this request.

If you want to have your data removed we have to determine if we need to keep the data, for example in case the HMRC wish to inspect our records. If we decide that we should delete the data, we will do so without undue delay.

13. Will we send emails to you?

As part of providing our service to you, we will send your report to you via email. The report will be encrypted, and password protected. Also, as part of this service, we may need to send details of your appointments to you via e-mail. To protect your information, the appointment letter will be encrypted and password protected.

14. Non Compliance:

14.1 All staff, associates, students, volunteers within NWNS and individuals from other organisations working on NWNS premises, have a role to play in enforcing the policy and are required to report any observed or reported breaches to Dr Karen Addy, Clinical Director. Breaches will be reported to the Information Commissioner's Office (ICO).

14.2 Any member of staff refusing to observe the policy will be subject to disciplinary action in accordance with the NWNS Disciplinary Policy up to and including dismissal.

15. Implementation of the Policy

Overall responsibility for policy implementation and review rests with Dr Karen Addy, Clinical Director. However, all staff, associates, students, volunteers within NWNS and individuals from other organisations working on NWNS premises, are required to adhere to and support the implementation of the policy. NWNS will inform all existing members of staff and Associates about this policy and their role in the implementation of the policy. New employees and Associates will be provided with a copy of the policy on induction to NWNS. All employees and Associates are required to conform to the policy and compliance is assessed via a GDPR checklist.

16. Review:

This Policy will be reviewed every 3 years and when there are changes in legislation or if it is deemed necessary from time to time. All such revisions will be brought to the attention of employees and Associates.

17. Further Information:

If your questions are not fully answered by this Policy, please contact our Data Protection Officer, North Wales Neuropsychology Services, Unit 1c Ash Court, Ffordd Y Llyn, Bangor, Gwynedd, LL57 4DF. If you are not satisfied with the answers from the Data Protection Officer, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk>

Appendix 1

1. **What is a cookie?**

A cookie is a small amount of data stored on a computer that contains information about the internet pages that have been viewed from that computer. They are commonplace on the internet and are used by websites to improve the user's online experience by storing information about how the user navigated around and interacted with it. This information is then read by the website on the next occasion that the user visits. Cookies are sent automatically by websites as they are viewed, but in order to protect a user's privacy, a computer will only permit a website to access the cookies it has sent, and not the cookies sent by other sites. Furthermore, users can adjust the settings on their computer to restrict the number of cookies that it accepts, or notify them each time a cookie is sent. This should improve privacy and security but will generally mean that certain personalised services cannot be provided, and it may therefore prevent the user from taking full advantage of a website's features. For further information on cookies, please visit www.aboutcookies.org.

2. **What sort of cookies do we use on our website?**

We use two types of cookies: session cookies and stored cookies. Session cookies expire at the end of the user's browser session and can also expire after the session has been inactive for a specified length of time, usually 20 minutes. Session cookies are stored in the computer's memory and are automatically deleted from the user's computer when the browser is closed. Stored cookies are stored on the user's computer and are not deleted when the browser is closed. Stored cookies can retain user preferences for a particular website, allowing those preferences to be used in future browsing sessions.

3. **How do we use cookies?**

We use an independent website provider who gather information regarding the visitors to our website on our behalf using cookies, log file data and code which is embedded on our website. We use this type of information to help improve the services it provides to its users. We explicitly require that third parties do not use any information for their own business or other purposes.

4. **Can I browse your website without receiving any cookies?**

Yes. If you have set your computer to reject cookies, you can still browse our website. However, certain functions may not be available to you unless you enable cookies.

5. **How can I find and control cookies?**

You can usually adjust for yourself the number of cookies that your computer (or other device, such as a mobile phone) receives. How this is done, however, varies according to which device and what browser software you are using.

As a general rule, the more commonly used web browser software packages tend to have a drop-down menu entitled 'Tools'. One of the options on this menu is usually 'Options' – and if this is selected, 'Privacy' is usually one of the settings that may be adjusted by the user. In the case of any device other than a PC (e.g. mobile phone), you should always refer to the manufacturer's instructions. Alternatively, you may wish to opt-out from only the cookies used by third-party companies (acting on our behalf) to measure the traffic to our site. This has the advantage of leaving other cookies in place, thereby minimising the loss of functionality associated with blocking all cookies. You may find the following websites useful for information on how to change cookie settings in a range of commonly used browsers: www.aboutcookies.org

Please note we only use cookies for the purpose of enhancing your online experience and no personal data is collected from you through this process.