

Data Management, Protection and Privacy Policy

ASC Psychology Ltd. 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 ASC Psychology Ltd. collects when you use our services. This information includes personal information as defined in the General Data Protection Regulation (GDPR) 2016 and the Data Protection Act 2018.

This policy describes how we manage your information when you use our services, if you contact us, or when we contact you. ASC Psychology Ltd. uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 2018 and the GDPR 2016. As per these laws, ASC Psychology Ltd. is the data controller. ASC Psychology Ltd. uses business support services, which are provided by Psychology4Learning. Business support personnel act as data processors.

If your questions are not fully answered by this policy, please contact our Data Protection Officer (Dr Antonia Cobbald, antonia.cobbald@ascpsychology.co.uk). If you are not satisfied with the answers from the Data Protection Officer, you can contact the Information Commissioner's Office (ICO) <https://ico.org.uk>.

Why Do We Need to Collect Your Personal Data?

We gather this information on our clients to enable us to carry out a thorough and holistic assessment of additional learning, or emotional well being needs. Specifically we need to collect information about you, and where relevant your child and family, 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 goods and services to you. The legal basis for this is the contract with you.
- Process your payment for the goods and services. The legal basis for this is the contract with you.
- Verify your identity so that we can be sure we are dealing with right person. The legal basis for this is a legitimate interest.
- Optimise your experience on our website. The legal basis for this is a legitimate interest.

What Personal Information Do We Collect and When Do We Collect It?

For us to provide you with goods and services, we need to collect the following information:

- Your name
- Your contact details including a postal address, telephone number(s) and electronic contact such as email address.

If working with your child, we need to collect the following information:

- Your child's name and date of birth
- Your child's developmental and educational history

We collect this information directly from you. We may also collect information about you, or your child, from third parties; for example, if we need to gather information from another health professional to provide a complete assessment. We will always seek your permission before contacting another professional about you or your child.

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. For example we use your name and contact details (telephone number, email address and/or postal address) so that we can inform you about your appointments with us.
- To deliver the correct service to you and/or your child. For this purpose we use details such as your name, your child's name, your contact details, details about the services you have purchased and the information you have provided about your child's educational and developmental history.
- To create your invoice we use your name and email address.

Where do we keep the information?

We keep your information in the stores described below.

- On our company computers. We use personal computers that are located on our business premises. The computers are password protected and the hard drives are encrypted. Passwords are changed every 90 days and it is company policy that passwords are not shared.
- We use OneDrive to store data. This service is password protected and information is encrypted at rest and in transit.
- Your customer record. We use Microsoft Excel which is a computer program that stores the information on a computer in our office. The customer record includes the most recent date you used our services.
- Your report or your child's report. We create a report that contains all the information that we gather, as well as our findings and conclusions.
- As a paper copy. We take hand written notes when we meet you. These notes are used to create the report that we provide to you, and are stored in a locked filing cabinet.

How long do we keep the information?

We keep electronic copies of reports and a customer record for 7 years for adults, and until child are 25 years old. We keep paper notes and questionnaires for 2 months after the report has been issued to you. We keep electronic copies of invoices for seven years as this is the required length to comply with HMRC requirements.

Who Do We Share Data With?

We keep data confidential. We never share data unless we have the express permission of clients, and/or clients' parents. If a third party (for example another professional working with one of our clients) contacts us asking for information, we will always check with parents and/or the clients themselves before sharing any information.

A. Cobbald, September 2018

To be reviewed: August 2019