

Data Privacy Policy

This information sheet explains why I keep your information, where I keep it, how I keep it safe, and what your rights are. On 25 May 2018, the law changed with regard to how organisations have to protect your 'data' (personal details and records) and this is called the General Data Protection Regulation or GDPR. The following summary highlights how GDPR is being implemented by Dr Lucky Psychology Ltd, by explaining why confidential information is held and how this is protected. Please see <https://ico.org.uk> for more details.

The basics

- I keep information about you in order to provide you with a service, and to process payments.
- I cannot work with you unless you allow me to keep records.
- I follow the law, and the codes of practice set down by the HCPC and the BPS
- I have systems in place to protect your data.
- You are entitled to request a copy of your data free-of-charge, and to have inaccurate information corrected.
- I aspire to the highest data privacy standards. If you have questions, concerns or feedback then please let me know so that I can address them.
- You can complain to the Information Commissioners Office (ICO) if you think that I am acting unlawfully: visit ico.org.uk/concerns or phone 0303 123 1113.

Why I keep information

Keeping records is an essential component of healthcare, which helps in understanding how best to help. My professional registration also requires me to keep information about my clients and the work that I do. I cannot offer you services unless you allow me to keep data about you and our work together.

The legal basis I have what is known as a legitimate interest for keeping data. I am registered with the Information Commissioners Office (ICO) to do so (ZA791592). I also follow the rules set down by my professional regulator (the Health and Care Professions Council; HCPC), and the British Psychological Society (BPS).

What information I keep

The information I collect falls largely into two categories, personal data and sensitive data.

Personal data is any piece of information that someone can use to identify, with some degree of accuracy, a living person. This can include things like (but not limited to):

- Your name

Phone: 07988375464
E-mail: hello@drluckypsychology.co.uk
Website: www.drluckypsychology.co.uk



- Address
- Phone number
- Email
- Also, anything that can affirm your physical presence somewhere (e.g. appointment times, CCTV footage)

Sensitive data is a specific set of “special categories” that must be treated with extra security. This includes things like (but not limited to):

- Racial or ethnic origin
- Gender
- Social history
- Consultation notes from our meetings and sessions
- Assessments and outcome measures

How long I keep data

Mental health records are subject to special legislation (www.gov.uk/government/publications/records-management-code-of-practice-for-health-and-social-care). Adult records are kept for 8 years after the last contact with the service. Child records are kept for 8 years after the child’s 18th birthday.

This benchmark will be applied to all clinical records made in the process of engagement with Dr Lucky Psychology Ltd.

What I do with the information

I use the data I collect for three reasons:

- (1) to provide you with services,
- (2) for billing and processing payments,
- (3) to help prevent serious harm.

Where I keep data

Primarily I store all data on WriteUpp which is a practice management software I subscribe to. WriteUpp is owned and operated by Pathway Software (UK) Ltd and contracted to individuals for secure storage. WriteUpp is a secure cloud-based software which I use to store all personal and sensitive data I collect on you.

Alongside this I may also store data:

- In my file storage cloud: Google Drive
- On my laptop

Phone: 07988375464
E-mail: hello@drluckypsychology.co.uk
Website: www.drluckypsychology.co.uk



- In a paper file
- In my mobile phone
- In my email systems
- My website uses cookies so that I can see how many people have visited and which pages are most popular. Google may send additional cookies if you use the google map links on the site. Cookies are anonymous and contain no personal data. You can turn cookies off in your website browser if you wish to.

How I keep data safe

- WriteUpp is ISO27001 certified which means it is secure and uses 256-bit SSL encryption and two factor authentication (2FA).
- My personal accounts are locked with a strong password and 2FA.
- My laptop is encrypted using Apple's full-disk Fire Vault; I use Apple's Firewall to prevent others gaining access to my computer.
- My paper notes are stored in a locked cabinet. I bring them to the clinic for our meetings and return them to the cabinet after the meeting for the duration of working together. Once we have finished working together, I ensure all data is stored on WriteUpp and shred any paper files.
- My mobile phone is encrypted and must be opened with a password or fingerprint each time I use it.
- My email systems are secured with a password and 2FA.
- Accesses to the analytics on my website are secured with a strong password.
- All my passwords are stored in a password manager on my phone.
- I use Google Authenticator on my phone to generate 2FA codes.

You have the right to

- Request details of all the information that I keep and to receive it within one month at no fee.
- Have information corrected if you consider it inaccurate or incomplete.
- Complain if you think that I am acting unlawfully (see the basics, above).

It is assumed that by engaging with the service you are consenting to records being kept.