



PRIVACY NOTICE - THERAPY CLIENTS

This Privacy Policy is issued by Retreat to Advance Limited (referred to as “Retreat to Advance”, “we”, “us” and “our” in this Privacy Policy), a provider of Therapeutic services which operates in the Isle of Man.

This privacy notice explains what information we collect and what that information is used for.

Retreat to Advance Limited is a data controller for the purposes of the Data Protection Act 2018 and the Data Protection (Application of GDPR) Order 2018 and the Data Protection (Application of LED) Order 2018, together with any regulations made under them (Manx Data Protection Legislation).

Your information will be held by Retreat to Advance, and this privacy notice sets out how we promise to look after your personal information. This includes what you tell us about yourself and what we learn by having you as a client. This notice also tells you about your privacy rights and how the law protects you.

When you use Retreat to Advance Limited’s services, we may ask you to share personal information with us.

When we collect your personal information, we will:

- Only collect what we need and no more
- Keep your information secure
- Tell you how we will use your information
- Delete your information when it is no longer needed
- Only process your information in line with rules set out in Manx Data Protection legislation.

How and why we ask you to share your personal information?

We collect and process information, including personal information in order to administer and deliver the service you have requested, and to comply with any legal or professional body responsibilities that ensue in the delivering of that service.

We will only use your personal data fairly and where we have a lawful reason to do so. We are allowed to use your personal data if we have your consent or another legally permitted reason applies. These include to fulfil a contract we have with you, when we have a legal duty that we have to comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest if it is fair and reasonable to do so.

We use your personal information in line with the rules set out in the Data Protection Act 2018 for the following reasons:

- Where you have agreed to the process. If we rely on your consent to process your information you may withdraw your consent at any time by contacting the Data Protection Officer.

- To allow us to communicate with you and record the relevant personal contact details you give consent for us to hold.
- To record emergency contact information. If you give us information about another person it is your responsibility to ensure and confirm that you have either told the individual who we are and how we use personal information, as set out in this Privacy Policy, and have permission from the individual to provide that personal information to us and for us to process it, as set out in this Privacy Policy; or you are otherwise satisfied that you are not in breach of data protection legislation by providing the information to us.
- Where applicable, to make clinical assessments and record clinical notes. Ownership of records and notes will remain the property of Retreat to Advance Limited, but you have the right to request and view any of your case notes or records that are held by us.
- To process payments you make.

When do we need to collect your sensitive information?

In certain circumstances, we will collect information that is deemed sensitive. This is most likely to include information about your health, for example, when we record answers to questions we may ask about your health, in order to determine the treatment you require.

We seek to limit any sensitive personal data that we collect and, unless we have other specific lawful reasons to use this information (such as in an emergency situation), we will ask for your consent to collect it.

What data may we collect?

We collect and use lots of different types of personal data. Personal data is any information that relates to you and that identifies you either directly from that information, or indirectly by reference to other information that we have access to. The personal data that we collect, and how we collect it, depends upon how you interact with us. Categories of personal data that we collect include:

Contact: Such as your name, email address and telephone number.

Socio-Demographic: This includes details about your work or profession, nationality and education.

Contractual: Details about the products or services we provide to you.

Communications: What we learn about you from letters, emails and conversations between us.

Special types of data: The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so. The special types of data we are likely to collect is limited to health data (referred to above) including gender.

Consents: Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you.

Financial: Billing and financial information such as billing address, bank account and payment information.

How will we keep your personal information secure?

We are committed to protecting the confidentiality and security of the information that you provide to us. We put in place appropriate technical, physical and organisational security measures to protect against any unauthorised access or damage to, or disclosure or loss of, your information.

We will ensure that:

- Safeguards are in place to make sure personal information is kept securely, ensuring the physical and digital security of our equipment, devices and systems by mandating appropriate password protection and access restrictions.
- Only authorised staff are able to view your information.
- Client notes showing the date and a brief outline of session content are recorded in a hand-written paper file format which has an anonymized code system and stored in a locked cabinet. The anonymized client notes are used for clinical supervision purposes only to comply with professional body requirements and good ethical practice.

We will only share personal information as follows:

If a safeguarding issue arises (risk of harm to yourself or someone else) or there is a requirement to give evidence in court, per the Contract for Therapy. Your personal information will not be disclosed to any third party without your prior consent or where required to do so by law. We will not sell to, or share, your personal information with other companies, organisations or individuals.

How long do we keep your personal information?

We will only keep your information for the minimum time necessary. On written request, or no longer than seven years after our last contact, we will delete any electronic records and destroy paper records by shredding.

What are your rights?

To ask if we hold personal information about you - You can ask to see what information we hold about you by submitting a Subject Access Request to the Data Protection Officer.

You can review your personal information and ensure it is accurate - Where possible we will provide you with access to the information we hold about you so that you can view this information and provide a means for you to have this information changed if it is not accurate.

Alternatively you can ask for the information we hold about you to be changed by making a request to the Data Protection Officer.

To remove your personal information - In certain circumstances you can ask for your information to be deleted. You can request this by contacting the Data Protection Officer.

To make a complaint - If you are unhappy with the way we deal with your personal information you can submit a complaint to the Data Protection Officer who will work with you to resolve any issues.

Retreat to Advance Limited is registered with The Information Commissioner. The Information Commissioner is the independent authority responsible for upholding the public's information rights and promoting and enforcing compliance with the Island's information rights legislation.

You have the right to request the Information Commissioner to undertake an assessment as to whether the processing of your personal data has been carried out in accordance with the provisions of the Data Protection Act 2018. You can obtain further information about, and make contact with, The Information Commissioner via their website at <https://www.inforights.im>

Contact details - Data Protection Officer

Email address: dpo.retreat2advance@gmail.com Telephone: +44 7624 331866

Postal address: DPO, Retreat to Advance Limited, Lawson's Croft, The Lhen, Andreas, Isle of Man, IM7 3EH

Will this privacy notice change?

This Privacy Notice may change. We will not reduce your rights under this Privacy Notice without your consent. If any significant change is made to this Privacy Notice, we will provide a prominent notice on our website so that you can review the updated Privacy Notice.

This privacy notice was last updated in March 2023.