

# Privacy notice

Corinium Acupuncture & Eastern Healing Arts trading as Cotswold Community Acupuncture

The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the GDPR). This legislation gives rights to you as an individual and obligations to organisations holding your personal data.

One of the rights is a right to be informed, which means we must give you information about the way in which we use, share and store your personal information.

As such, we publish a privacy notice, so you can access this information along with information about the rights you have in relation to the information we hold on you and the legal basis on which we are using it.

## Who are we?

Corinium Acupuncture & Eastern Healing Arts trading as Cotswold Community Acupuncture is the data controller (contact details: [cotswoldcommunityacupuncture@gmail.com](mailto:cotswoldcommunityacupuncture@gmail.com), 01285 658105, [cotswoldcommunityacupuncture.com](http://cotswoldcommunityacupuncture.com)). This means we decide how your personal data is processed and for what purposes.

## Whose information does this privacy notice apply to?

This privacy notice applies to information we collect from:

- current, prospective and former patients;
- people attending our classes, workshops and courses;
- people who subscribe to our newsletters;
- visitors to our website;
- job applicants and our current and former staff.

## What is personal data?

Personal data relates to a living individual who can be identified from that data.

Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. Examples of personal data we may hold about you include your contact and appointment details.

Special category data is a sub-category of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Examples of special category data we may hold about you include your patient notes.

## How do we process your information?

We comply with our obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We store your information both electronically and on paper.

Please note that we are unable to send or receive encrypted emails, so you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send us is within the bounds of the law.

We use your personal data for the purposes set out below.

## Your contact and booking information

We use your name, address, telephone number and email address to make and rearrange bookings.

We record all appointments for patients attending our clinic and delegates attending classes/workshops to keep a record of when you were treated / attended classes/workshops for tax purposes and to secure potential evidence in the event of a criminal prosecution, civil litigation, insurance claim or complaint to any of our regulatory bodies.

## Your health and treatment information

Sous patients and prospective patients tell us about their medical conditions and medication by email or online enquiry forms.

We use the following information for the purposes of making a full traditional diagnosis, formulating treatment strategy and treatment planning:

- your presenting complaint and symptoms reported by you
- any relevant medical and family history you have told us
- our clinical findings about your health and wellbeing

We keep a record of and refer to that record of any treatment given and details of progress of your case, including reviews of treatment planning to enable us to: review the full traditional diagnosis, treatment strategy and planning; and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.

We record and use any information and advice that we have given, especially when referring patients to any other health professional, to help you to receive the most appropriate treatment and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.

We record any decisions made in conjunction with you to help you to receive the most appropriate treatment and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.

Where relevant we maintain records of the patient's consent to treatment, or the consent of their next-of-kin to be able to prove that the patient (and/or parent/guardian/next of kin) has given informed consent to treatment to secure evidence in the event of a civil claim, criminal prosecution, insurance claim or complaint.

## When we may share your information with others

We use your GP's name and address if we need to contact your GP including in an emergency.

In the event of an adverse incident occurring to any of our patients we report the matter to one or more of our regulatory bodies and to our insurance company to enable the insurance company to deal with any potential claims and to help our regulators to develop safe practice guidelines, as well as providing research data and information for our regulators' insurers and other interested parties.

We may use your date of birth to help identify patients with the same name to avoid mistakes being made as to safe and appropriate treatment, for identification purposes if referring a patient to another health practitioner, and for identification purposes if writing to another healthcare practitioner so that they correctly identify the patient.

## Information about accidents

We keep accident records for any patients, visitors or staff who are involved in accidents at our clinic in accordance with UK Health and Safety legislation including the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) to comply with the law and to secure evidence in the event of criminal proceedings, civil litigation, an insurance claim or complaint.

## Information about complaints

If we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We usually must disclose the complainant's identity to whoever the complaint is about. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We may need to provide personal information collected and processed in relation to complaints to our regulators or our insurance company.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

## Information we use for marketing purposes

We only use your information for the following marketing purposes if we have your explicit consent to do so:

- We use your name, address, telephone number and email address to send you marketing materials.
- We use your date of birth to wish you a happy birthday in person, by email or post.
- We maintain and use records of subscribers to our newsletters for marketing purposes. We gather statistics around email opening and clicks using industry standard technologies (MailChimp) to help us monitor and improve our e-newsletters. We can see who has opened each newsletter and which links they have clicked on.

## Information about visitors to our website

When someone visits our website, we may use a third-party service (Google Analytics) to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.



Cotswold Community Acupuncture  
24 Thomas Street, Cirencester, GL7 2BD  
[www.cotswoldcommunityacupuncture.com](http://www.cotswoldcommunityacupuncture.com)

*Cotswold Community Acupuncture was set up to  
make safe, effective acupuncture treatment  
economically accessible to everyone.*

We may use website cookies to improve user experience of our website by enabling our website to 'remember' users, either for the duration of their visit - using a 'session cookie' - or for repeat visits - using a 'persistent cookie'.

We use a third-party service (Wix) to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website.

We use a third-party service, (Wix), to host our website including publishing our blog. This site is hosted at Wix, which is run by Wix. We use a standard Wix service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

## Information about staff

We are the data controller for the information job applicants provide during the recruitment process. All the information you provide during the process will only be used for progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for the role. You don't have to provide what we ask for, but it might affect your application if you don't.

We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for.

We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You will therefore be required to provide:

- Proof of your identity – you will be asked to attend our clinic with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our clinic with original documents, we will take copies.

You will be asked to complete a criminal records declaration to declare any unspent convictions.

We will contact your referees, using the details you provide in your application, directly to obtain references.

If you begin work with us, we will also ask you for the following:

- Bank details – to process payments
- Emergency contact details – so we know who to contact in case you have an emergency at work.

If you are successful, the information you provide during the recruitment process will be retained by us as part of your staff file for the duration of your work with us plus 6 years following the end of your work with us. This includes your criminal records declaration, fitness to work, records of any references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the recruitment process.

Information generated throughout the process, for example interview notes, is retained by us for 6 months following the closure of the recruitment process.

All the information gathered during the process is considered to make final recruitment decisions.

You can ask about decisions made about your application by speaking to Sarah Attwell-Griffiths or by emailing [enquiries@coriniumacupuncture.co.uk](mailto:enquiries@coriniumacupuncture.co.uk).

## Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared:

- with named third parties with your explicit consent;
- with the relevant authority such as the police or a court, if necessary for compliance with a legal obligation to which we are subject e.g. a court order;
- with your doctor or the police if necessary to protect yours or another person's life;
- with the police or a local authority for safeguarding children or vulnerable adults; or
- with our regulators or our insurance company in the event of a complaint or insurance claim being brought against us; or
- our solicitor in the event of any investigation or legal proceedings being brought against us.

For further details about the situations when information about you might be shared please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/personal-information/sharing-our-info/>.



## How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary. We keep patient records for a period of 7 years in accordance with the British Acupuncture Code of Professional Conduct <https://www.acupuncture.org.uk/public-content/effective-practice/bacc-professional-codes.html>. We keep staff records for a period of 6 years following the end of their work with us in case of any legal claims/complaints, for safeguarding purposes and for our tax records. We keep all other records for a period of 2 years.

We will update any information we hold about you as quickly as is reasonable possible when you inform us of any changes (for example, if you tell us that you have moved to a new address). At any time, you may request that changes are made to your contact details.

When we destroy paper records, we do so by shredding or incineration.

If one of the Owners of Corinium Acupuncture & Eastern Healing Arts trading as Cotswold Community Acupuncture (Sarah or Katherine Attwell-Griffiths) becomes ill or dies, the remaining Owner will continue to look after your information as set out in this Privacy Notice.

## Your rights and your personal data

Unless subject to an exemption under the GDPR, you have certain rights with respect to your personal data as set out below.

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing at any time. This right does not apply where we are processing information using a lawful purpose other than consent.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data.
- The right to be informed if your data is lost. We will also inform the Information Commissioner's Office.
- The right to lodge a complaint with the Information Commissioner's Office.

For further details about these rights, please see the Information Commissioner's website at <https://ico.org.uk/for-the-public/is-our-information-being-handled-correctly/>



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## Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, we will provide you with a new notice explaining this new use prior to commencing the processing. Where and whenever necessary, we will seek your prior consent to the new processing.

## Contact Details

To exercise all relevant rights, queries or complaints, please contact us in the first instance at [enquires@coriniumacupuncture.co.uk](mailto:enquires@coriniumacupuncture.co.uk) or on 01285 658105.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.