

# Simple Touch Massage: Written Statement of Information Practices

## ***Collection of Personal Health Information:***

We collect your personal health information directly from you, or from the person acting on your behalf. Examples of the type of personal health information that we collect may include, your name, year of birth, health history, records of your visits to Simple Touch and details of the treatment that you received during your visits. We may sometimes collect personal health information about you from other sources, if we have obtained your consent to do so, or if the law permits.

## ***Uses and Disclosures of Personal Health Information:***

We may use and disclose your personal health information for the following purposes:

- Treat and care for you;
- To produce invoices for those reclaiming their fee with private insurers and such. If required providing evidence of treatments accordingly.
- Plan, administer and manage our internal operations;
- Conduct risk management and quality improvement activities;
- Comply with legal and regulatory requirements; This means that your data will be held for a period of 7 years after your last appointment and then disposed of in a safe and secure way.
- Fulfill other purposes permitted or required by law;

## ***Your Rights:***

You may access and correct your personal health records, or withdraw your consent for some of the above uses and disclosures (subject to legal exceptions) by contacting our contact person.

## ***Our Responsibilities:***

We take steps to protect your personal health and financial information from theft, loss, unauthorized access, copying, modification, use, disclosure, and disposal.

We conduct audits to monitor and manage our privacy compliance

We take steps to ensure that everyone who performs services for us protects your privacy and only uses your personal health information for the purposes you consented.

## ***Contact Us:***

Our Contact Person is Kathryn Crooks

To find out more about our privacy protection practices, or raise any concerns, contact our contact person at:

**Tel No:** 07495 246241      **E-mail:** [kcrooks@simpletouchmassage.co.uk](mailto:kcrooks@simpletouchmassage.co.uk)

You have the right to file a complaint to the Information Commissioner's Office if you think we have violated your rights. The Commissioner can be reached at:

Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow  
Cheshire, SK9 5AF

Tel: 0303 123 1113 Website: [www.ico.co.uk](http://www.ico.co.uk)

# Simple Touch Massage

## **Privacy Policy**

Privacy of personal information is an important principle to Simple Touch. We are committed to collecting, using and disclosing personal information responsibly and only to the extent necessary for the goods and services we provide. We also try to be open and transparent as to how we handle personal information. This document describes our privacy policies.

### ***What is Personal Information?***

Personal information is information about an identifiable individual. Personal information includes information that relates to their personal characteristics (e.g., gender, age, income, home address or phone number, ethnic background, family status), their health (e.g., health history, health conditions, health services received by them) or their activities and views (e.g., religion, politics, opinions expressed by an individual, and opinion or evaluation of an individual).

## **Who We Are**

Simple Touch includes at this time of writing just one Complementary Therapist. Currently no other agents have any access to client details as all accounting, website administration and general file administration is completed by Kathryn Crooks only. We restrict access by others to any personal information we hold as much as is reasonably possible.

## **We Collect Personal Information: Primary Purposes**

### **About Clients**

We collect, use and disclose personal information in order to serve our clients. For our clients, the primary purpose for collecting personal information is to provide treatment. For example, we collect information about a client's health history, including family history, physical condition and function and social situation, in order to help us assess what the client's health needs are, to advise the client of his/her options and then to provide the health care the client chooses to have. A secondary primary purpose is to obtain a baseline of health and social information so that in providing ongoing health services we can identify changes that are occurring over time. It would be rare for us to collect such information without the client's express consent, but this might occur in an emergency (e.g., the client is unconscious) or where we believe the client would consent if asked and it is impractical to obtain consent (e.g., a family member passing a message on from our client we have no reason to believe the message is not genuine).

### **About Members of the General Public**

For members of the general public, our primary purposes for collecting personal information are to provide notice to special events (e.g., a seminar or conference) or to make them aware of massage therapy services in general, or our clinic in particular. For example, while we try to use work contact information where possible, we might collect home addresses and e-mail addresses. We try to obtain consent before using any such personal information, but where this is not, for any reason, possible, we will upon request immediately remove any personal information from our distribution list.

On our website we only collect, with the exception of cookies, the personal information you provide and only use that information for the purpose you gave it to us (e.g., to respond to your e-mail message or to book a treatment). Cookies are only used to help you navigate our website and are not used to monitor you.

## **We Collect Personal Information: Related and Secondary Purposes**

Like most organizations, we also collect, use and disclose information for purposes related to or secondary to our primary purposes. The most common examples of our related and secondary purposes are as follows:

- To provide confirmation and reminders of your appointments we use the 10to8 booking system. You are welcome to choose whether to add your email or mobile number (or both if preferred). Messages will only be sent regarding an appointment that is booked and not for sending any other mailings.
- To produce invoices for clients reclaiming the cost of their treatments.
- To advise clients that have not been seen for 3 months that they should now be considering a treatment.
- Our clinic reviews client and other files for the purpose of ensuring that we provide high quality services, including assessing the performance of our staff. In addition, external consultants (e.g., lawyers, auditors, practice consultants, voluntary accreditation programs) may on our behalf do audits and continuing quality improvement reviews of our Clinic, including reviewing client files and interviewing our staff.
- The cost of some goods/services provided by the organization to clients is reclaimed by third parties (e.g. private insurance). These third party payers often have your consent or legislative authority to direct us to collect and disclose to them certain information in order to demonstrate client entitlement to this funding.
- Clients or other individuals we deal with may have questions about our goods and services after they have been received. We also provide ongoing services for many of our clients over a period of months or years for which our previous records are helpful. We retain our client information for a minimum of seven years after the last contact to enable us to respond to those questions and provide these services (our insurance company also requires us to retain our client records).
- If Simple Touch or its assets were to be sold, the purchaser would want to conduct a “due diligence” review of the Clinic’s records to ensure that it is a viable business that has been honestly portrayed to the purchaser. This due diligence may involve some review of our accounting and service files. The purchaser would not be able to remove or record personal information. Before being provided access to the files, the purchaser must provide a written promise to keep all personal information confidential. Only reputable purchasers who have already agreed to buy the organization’s business or its assets would be provided access to personal information, and only for the purpose of completing their due diligence search prior to closing the purchase.

You can choose not to be part of some of these related or secondary purposes (e.g., by declining to receive notice of prompting for next treatment). We do not, however, have much choice about some of these related or secondary purposes (e.g., external regulation).

***Protecting Personal Information:***

We understand the importance of protecting personal information. For that reason, we have taken the following steps:

- Paper information is either under supervision or secured in a locked or restricted area.
- Electronic hardware is either under supervision or secured in a locked or restricted area at all times. In addition, passwords are used on computers. All of our cell phones are digital, which signals are more difficult to intercept.
- Clients who call or text on a regular basis have their number stored on the company mobile phone for identification purposes.
- Electronic information is transmitted through direct line
- Staff are trained to collect, use and disclose personal information only as necessary to fulfill their duties and in accordance with our privacy policy.
- External consultants and agencies with access to personal information must enter into privacy agreements with us.

***Retention and Destruction of Personal Information:***

We need to retain personal information for some time to ensure that we can answer any questions you might have about our services provided and for our own accountability to external regulatory bodies. However, we do not want to keep personal information too long in order to protect your privacy.

We keep our client files for seven years. Our client and contact directories are much more difficult to systematically destroy, so we remove such information when we can if it does not appear that we will be contacting you again. However, if you ask, we will remove such contact information right away. We keep any personal information relating to our general correspondence (i.e., with people who are not clients) newsletters, seminars and marketing activities for about two months after the event ceases or a seminar or marketing activity is over. We destroy paper files containing personal information by shredding. We destroy electronic information by deleting it and, when the hardware is discarded, we ensure that the hard drive is physically destroyed.

***You can look at your Information:***

With only a few exceptions, you have the right to see what personal information we hold about you. Often all you have to do is ask. We can help you identify what records we might have about you. We will also try to help you understand any information you do not understand (e.g., short forms, technical language, etc.). We will need to confirm your identity, if we do not know you, before providing you with access. We reserve the right to charge a nominal fee for such requests. If there is a problem we may ask you to put your request in writing. If we cannot give you access, we will tell you within 30 days if at all possible and tell you the reason, as best we can, as to why we cannot give you access.

If you believe there is a mistake in the information, you have the right to ask for it to be corrected. This applies to factual information and not to any professional opinions we may have

formed. We may ask you to provide documentation that our files are wrong. Where we agree that we made a mistake, we will make the correction and notify anyone to whom we sent this information. If we do not agree that we made a mistake, we will still agree to include our file in a brief statement from you on the point and we will forward that statement to anyone else who received the earlier information.

### **Do you have a Question?**

Our Information Officer, Kathryn Crooks can be reached at [kcrooks@simpletouchmassage.co.uk](mailto:kcrooks@simpletouchmassage.co.uk) 07495 246241 or by mail Core Performance Clinic, 4-6 Sergeants Way, Bedford, Bedfordshire, MK41 0EH

She will attempt to answer any questions or concerns you might have.

If you wish to make a formal complaint about our privacy practices, you may make it in writing to our Information Officer. She will acknowledge receipt of your complaint; ensure that it is investigated promptly and that you are provided with a formal decision and reasons in writing.