

Data Privacy Policy

NEW GDPR is going LIVE on the 25th of May 2018!!

Please make sure you have read the GPDR 2018 page containing all the relevant updates

This policy aims to explain as clear as possible how and why we use information about our clients so that they can be confident that their privacy is protected.

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Overview

This policy describes the information that EASE Wellbeing collects when clients access our psychotherapy services. This information includes personal information as defined in the General Data Protection Regulation (GDPR) 2016 (and the subsequent UK Data Protection Bill that is expected to be enacted in 2018). The policy describes how we manage our clients' information when they receive our counselling services, if they contact us or when we contact them. It also provides extra details to accompany specific statements about privacy that clients' may see when you use our website (such as cookies). In respect of cookies the policy includes information about the type of cookies that we use and how clients may disable those cookies.

EASE Wellbeing uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, EASE Wellbeing is the data controller;

- if another party has access to our clients' data we will inform the clients if these third party companies are acting as a data controller or a data processor, who they are, what they are doing

with the clients' data and why we need to provide them with the information.

Definitions

See our definitions page for all terms referred to in our policies.

Why do we need to collect clients' personal data?

We need to collect information about clients so that we can:

- **Know who the clients are so that we can communicate with them in a personal way.** The legal basis for this is a legitimate interest.
- **Organise and deliver counselling services to you.** The legal basis for this is the contract with the clients.
- **Verify the clients' identity do that we can be sure we are dealing with right person.** The legal basis for this is a legitimate interest.
- **Contact clients in case there is a problem with the quality of service or with any part of it.** The legal basis for this is a legitimate interest.
- **Send clients' information and updates about their appointments.** The legal basis for this is legitimate interest.
- **Audit the service and disseminate results to commissioners and larger scientific community.** The legal basis for this is legitimate interest.

What personal information do we collect and when do we collect it?

For us to provide clients with an efficient service, we need to collect the following information:

1. Referral's source (General Practitioner's name on the referral)
2. Client's full name
3. Client's contact details: telephone number(s) and/or electronic contact such as email address
4. Client's date of birth
5. Client's Demographic information (Age, Gender, presence/absence of a long term condition, ethnicity, marital status, shared or not-shared living accommodation, presence/absence of dependants and their accommodation)
6. Client's psychological assessment notes and relative questionnaire data
7. Client's counselling treatment goals
8. Client's counselling session notes and relative questionnaire data
9. Date-time and IP address of each of clients' questionnaire submission

We collect this information either directly from clients when we see them or if they contact us or via the referral form that is passed to us by the General Practitioner. Not all the information above is stored and controlled by EASE Wellbeing as we rely on two 3rd party services. See section below for details.

Cookies and IP addresses

On our website, we use cookies to gather information about visitors which we use only to enhance their online experience. **We do not identify our clients via our cookies.** The information recorded in the cookies we set has the sole purpose of monitoring the usage and functioning of our website (see section below for more information on how we use cookies).

Similarly, we log the IP address of any form submission to the website. This is not used to develop a personal profile of clients, it is used to ensure our website is providing correct and relevant information to our counsellors and to our clients.

How do we use the information that we collect?

We use the data we collect from clients in the following ways:

- To communicate with our clients so that we can inform them about their appointments with us (3rd party service). In order to do so we use their name, their contact details such as telephone number and email address. We do not contact them for any other purpose that is not a pending appointment or an emergency.
- To deliver the correct service to clients we use a pseudonym and a unique client number that our counsellors assign to each one of their clients. Our clinical records do not trace back to any phone number, email address, name or surname.

Where do we keep the information and how do we process it?

We keep clients information in the stores described below. By submitting their personal data they are agreeing to this transfer, storing and processing of data.

Stored on our company computers

We use personal computers that are located on our business premises, on encrypted company laptops, on private servers set up and fully managed by ourselves and located in the EU. All 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 do not use Dropbox, Google Drive or any other third party cloud service to store clients data.

Clients data (with identity protected by pseudonyms) is stored using [MariaDB (<https://en.wikipedia.org/wiki/MariaDB>)] which is a relational database management system that stores the information on a private-server that we own and maintain via a web platform called "artoo" that was developed ad-hoc and that we maintain. In our company databases we store data relative to or derived from the counselling sessions. In particular:

Clients' records

- Unique client pseudonym
- Demographic information (Age, Gender, presence/absence of a long term condition, ethnicity)
- Numeric data extracted from the scoring of the questionnaires submitted by the client
- Date-time and IP address of each of clients' questionnaire submission

how is this data processed . This data is imputed using a browser to our server via an encrypted connection established with our platform "artoo" via a one-time authentication procedure. The process is as follow: at each data collection point, our therapist generate a token for a one-time authentication and the clients using their device (phone or tablet) or one of EASE tablets are then enabled to summon and submit a form using a secure connection. No other information (other than that in the form) is retained after this data submission to our servers. This data is stored in a [MariaDB (<https://en.wikipedia.org/wiki/MariaDB>)] database that is hosted on a virtual private server maintained by EASE wellbeing.

Counselling session notes

- Anonymised counselling treatment goals
- Anonymised session notes recorded by the therapist after each session
- Unique client pseudonym
- Anonymised status notes reporting information that our counsellors may need to best organise the right room or time for clients.
- Calculated questionnaire scores associated with client's pseudonym in our MariaDB

how is this data processed. This data is imputed using a browser to our server via an encrypted connection established between our therapist's device and our server. The platform used to view, enter and update this data is "artoo" and it is accessible only by EASE wellbeing employees via two-factor authentication. This data is stored in a [MariaDB (<https://en.wikipedia.org/wiki/MariaDB>)] database that is hosted on a virtual private server maintained by EASE wellbeing.

Stored on SetMore (third party service)

We use an on-line calendar and appointment management service that allows us to organise room booking for the counselling sessions in the most effective manner. On this specific appointment-scheduling platform we store data that is then controlled by SetMore. The information we store on SetMore is:

- Clients' name
- Clients' phone number
- Clients' email address

how is this data processed. The therapist establishes a secure connection with the scheduling platform SetMore and log into a private account where it is possible to manage the appointment scheduling of the surgery.

Furthermore, SetMore:

- Does not store or control any sensitive data and thus it does not store any information about the counselling sessions, its content or its outcomes. It only helps EASE to keep the scheduling of appointments as efficient as possible and to help remind clients (where agreed) when an appointment with our counsellor is imminent.
- Has stated that they are [compliant (<https://support.setmore.com/account-settings/setmore-and-gdpr>)] with GDPR.

Stored on GRiST (third party service)

We use an on-line risk prediction instrument that allow all our counsellor to approach risk evaluation and assessment with structured systematic methodology. This service is called GRiST (<https://www.egrlist.org/content/grist-solution>) and via secure connection our counsellor submit quantitative and qualitative information about risk under the same pseudonym registered in our MariaDB Database and which is unique to each client we see. The information we store on GRiST is:

- Unique client pseudonym
- Demographic information (Age, Gender, marital status, shared or not-shared living accommodation, presence/absence of dependants and their accommodation, ethnicity)
- Risk information in the relevant domains

how is this data processed. *The therapist establishes a secure connection with the GRiST (<https://www.egrlist.org/content/grist-solution>) platform via our platform "artoo" using GRiST secure API. Only via "artoo" it is possible to access and send information to GRiST.*

GRiST (<https://www.egrlist.org/content/grist-solution>) is the controller of this data however, GRiST:

- Does not store or control any information that can identify a particular client.
- Does not store or control any information about the counselling sessions, its content or its outcomes.

As a paper copy

We keep the GP screening questionnaire form that client's have submitted to us and to the GP (if they have ticked the informed consent at the bottom of it). The GP screening questionnaires are stored in our company records in paper forms together with client's signed consent forms (if any). This paper-format data is stored in a locked cabinet that has no direct connection with any other records that we may have of our clients in our Database ([MariaDB (<https://en.wikipedia.org/wiki/MariaDB>))].

How long do we keep the information?

- We keep clients' records of the sessions for 10 years. More detail is available in our Data retention policy.

Who do we send the information to?

- We send clients' reports or notes to our clients (if requested) and anyone we are required by law to inform. All reports that are sent electronically are sent as attachments that are encrypted and password protected.
- We *do not* send any personal data of clients' access to our website for submitting the forms, nor to our web analytics provider.

How can clients see all the information we have about them?

Clients can make a subject access request (SAR) by contacting the Data protection officer. In this case:

- We may require additional verification that the clients requesting is effectively who they say they are before we process this request.
- We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate the clients' [vital interests (<https://gdpr-info.eu/recitals/no-46/>)]

What if a client believes the information we hold is incorrect or they wish it to be removed from our system?

It is required for the subject or client to contact the Data protection officer. In this case:

- We may require additional verification that the subject requesting is effectively who they say they are before we process this request.
- If a client wishes to have their information corrected, they must provide us with the correct data and after we have corrected the data in our systems we will send them a copy of the updated information in the same format as the subject access request.

How can a client have their information removed?

If any client wants to have their data removed we have to determine case by case whether it is possible to do so without damages for the client or the therapist. If we decide that we should delete the data, we will do so without undue delay.

Will we send emails and text messages to clients?

As part of providing our service to clients we will:

- Send clients appointment reminders and appointment confirmation via email or text.
- No information regarding the content of the sessions will ever be sent without a specific and valid request by the client to which the data belongs or in specific cases of disclosure that are required by the law or by our Confidentiality Policy.

How can a client opt out of receiving emails and/or text messages from us?

- If a client is receiving reminders via text messages or via email from us, they may opt out at any time by notifying that to their therapist
- Clients will not receive any emails from us that is not a text or email reminder to which they have opted in.

Policy dissemination and review

Dissemination

The policy will be made available on EASE Wellbeing's shared database, here on the wiki page and it will be emailed to all staff for them to have access to. It is each member of staff's responsibility to read and understand EASE Wellbeing's Data Privacy Policy. It will additionally be accessible via EASE Wellbeing's website in order for the general public to access it.

Review

This policy will be reviewed every year, unless significant changes in practice or legislation are brought to EASE Wellbeing's attention, that require immediate policy review.

Cookies

What is a cookie?

A cookie is a small amount of data stored on a computer that contains information about the internet pages that have been viewed from that computer. They are commonplace on the internet and are used by websites to improve the user's online experience by storing information about how the user navigated around and interacted with it.

This information is then read by the website on the next occasion that the user visits. Cookies are sent automatically by websites as they are viewed, but in order to protect a user's privacy, a computer will only permit a website to access the cookies it has sent, and not the cookies sent by other sites.

Furthermore, users can adjust the settings on their computer to restrict the number of cookies that it accepts, or notify them each time a cookie is sent. This should improve privacy and security but will generally mean that certain personalised services cannot be provided, and it may therefore prevent the user from taking full advantage of a website's features. For further information on cookies, please visit [aboutcookies.org (<https://www.aboutcookies.org>)].

What sort of cookies do we use on our website?

Most clients submit their forms using our devices (tablet computers) and therefore no cookie is stored on the client's own device. However if the clients prefer or wants to fill in the forms using their own devices (e.g. a client's phone) then a *session cookie* will need to be accepted for them to be able to submit their forms.

All cookies that are served via *artoo* are [secure (https://en.wikipedia.org/wiki/HTTP_cookie#Secure_cookie)], [HttpOnly (https://en.wikipedia.org/wiki/HTTP_cookie#HttpOnly_cookie)], [SameSite (https://en.wikipedia.org/wiki/HTTP_cookie#SameSite_cookie)] cookies.

We only use one type of cookie:

- session cookies (https://en.wikipedia.org/wiki/HTTP_cookie#Session_cookie). Session cookies expire at the end of the user's browser session and can also expire after the session has been inactive for a specified length of time (120 minutes). These session cookies are stored in our company computer's memory and are automatically deleted from the user's computer when the browser is closed.

How do we use cookies?

The cookies are used solely to authenticate a specific connection for the submission of anonymous data via one of our devices (tablets). These cookies can be generated by one of our counsellors accounts using the *artoo* platform, are only valid for one submission and are time limited.

We do not gather any information about our clients or about any user visiting our platform via setting up cookies.

Can a client submit data to our platform (artoo.pw) without receiving any cookies?

No. If you have set your computer to reject cookies, you wont be able to submit your forms on-line and in that case you may require to fill in your forms using our tablet so that no cookie will be recorded on your device.

How can I find and control cookies?

You can usually adjust the number of cookies that your computer (or other device, such as a mobile phone) receives. How this is done, however, varies according to which device and what browser software you are using.

As a general rule, the more commonly used web browser software packages tend to have a drop-down menu entitled 'Tools'. One of the options on this menu is usually 'Options' - and if this is selected, 'Privacy' is usually one of the settings that may be adjusted by the user. In the case of any device other than a PC (e.g. mobile phone), you should always refer to the manufacturer's instructions.

Please note we only use session cookies for the purpose of enabling your form submission and no personal data is collected from you through this process.

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