

Privacy Notice

Under the General Data Protection Regulations (GDPR), you have specific rights. This privacy notice tells you what to expect when Willow Aislinn collects personal information. We are committed to processing your data securely and transparently. This notice applies to current and former patients.

Data Protection Principles

In relation to your personal data, we will comply with data protection law. This says that the personal information we hold about you must be:

- processed fairly, lawfully and in a clear, transparent way
- collected only for valid reasons that we find proper for the course of your time as a patient and not used in any way
- that is incompatible with those purposes
- only used in the way that we have told you about
- accurate and up to date
- kept only as long as is necessary for the purposes we outline
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed
- kept securely

Types of Information We Hold About You

Personal data or information means any information about an individual from which that person can be identified. It does not include data where the identity has been removed.

We hold many types of data about you, including:

- your personal details including your name, address, date of birth, email address, phone numbers
- gender
- personal medical or health information, including past medical history, stored anonymously

- information concerning examination and treatment at your first and subsequent visits

Special categories of data

There are “special categories” of more sensitive personal data which require a higher level of protection, such as information about a person’s health or sexual orientation.

- Health

We will use your special category data:

- to ensure the care you receive is appropriate to your condition
- to determine recommendations and advice

We must process special categories of data in accordance with more stringent guidelines. We will process special categories of data when the following applies:

- you have given explicit consent to the processing (at your first visit)
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public.

As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

The Personal Data We Process and What We Do with It

When you supply your personal details to this clinic they are stored and processed for 4 reasons:

1. We need to collect personal information about your health in order to provide you with the best possible treatment.
2. Your request for treatment and our agreement to provide that care constitutes a contract. You can, of course, refuse to provide the information, but if you were to do that we would not be able to provide treatment.
3. We have a legitimate interest in collecting that information, because without it we couldn't do our job effectively and safely.
4. We also think that it is important that we can contact you in order to confirm your appointments with us or to update you on matters related to your care. This again constitutes legitimate interest, but this time it is your legitimate interest.

Change of Purpose

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Retaining Your Personal Data

We retain your treatment records for as long as is needed from the date of your last visit to us.

We will retain your contact records indefinitely should you need to see us at some future date. However, we will be happy to delete this at your request once the legal obligation has passed.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Data Security – Protecting Your Data

We have put in place measures to protect the security of your information against accidental loss or disclosure, alteration, unauthorised access, destruction or abuse. We have implemented processes to guard against such. In addition, we limit access to your personal information to only the therapist.

Your records are stored:

1. Electronically, using email and secure file drives. The providers (Google, Apple) are fully compliant with the General Data Protection Regulations..

Sharing Your Personal Data

We will never share your data with anyone who does not need access without your written consent.

Only the following people/agencies will have routine access to your data:

- Your practitioner(s) in order that they can provide you with treatment.
- Insurance companies, when applicable, who are your co-data controllers.

Transferring Information Outside the EU

We do not share your data with bodies outside of the European Economic Area.

Your Rights

As we process your personal data, you have certain rights. These are a right of access, a right of rectification, a right to be informed, a right of erasure, a right to restrict processing.

- You may request a copy of your data at any time. Please provide the following information: your name, address, telephone number, email address and details of the information you require.
- If you believe any of the personal data we hold on you is inaccurate or incomplete, please contact us directly and any necessary corrections to your data will be made without undue delay.

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice. We must also inform you of any changes to how we use your data.
- If you believe we should erase your data, please contact us.
- If you wish us to stop storing, using, or restrict the processing of your data, please contact us.
- Where you have provided explicit consent for us to use your data you have a right to withdraw this consent at any time.
- We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

Fees

You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Breaches

Should your personal data that we control be lost, stolen or otherwise breached, where this constitutes a high risk to your rights and freedoms, we will contact you without delay. We will give you the contact details of the person who is dealing with the breach, explain to you the nature of the breach and the steps we are taking to deal with it.

Automated Decision Making and Profiling

We do not use any system which uses automated decision making or profiling in respect of your personal data.

Visiting the Website

When you visit www.doulawillow.se we 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 upfront about this. We will make it clear when we collect personal information and will explain what we intend to do with it.