Maintenance of Transcripts

Policy Statement – GDPR COMPLIANCE

# Fertility Massage Therapy Ltd, Heal the Womb Ltd and Womb Massage Therapy are the 3 companies owned by Clare Spink (was Blake)

*\*\*The 3 Company Names will be referred to in this document as Fertility Massage Therapy Ltd.*

## Staff Members of Fertility Massage Therapy Ltd:

Clare Spink (was Blake) – Director

Libby Talbot – PA

Leora Leboff – Associate Instructor - UK

Andrea Clarke – Associate Instructor – UK

Rebecca Chisholm – Associate Instructor – Scotland

Janine De Wolf – Associate Instructor – The Netherlands

Melissa Hildage – Associate Instructor – Australia

Edwina Taylor – Associate Instructor – Australia

Carol Borschman – Associate Instructor – Australia

Natalie Zuckerman – Associate Instructor – Australia

Jacqui Ward – Associate Instructor – Australia

Fertility Massage Therapy collects and uses information about people with whom it communicates, which includes Students and Clients.

Fertility Massage Therapy regards the lawful and correct treatment of personal information as very important to the successful and efficient performance of its functions, and to maintain

confidence between those with whom it deals.

To this end Fertility Massage Therapy fully endorses and adheres to the Principles of Data Protection, as set out in the Data Protection Act 1998.

**Purpose**

The purpose of this policy is to ensure that the staff of Fertility Massage Therapy are clear about the purpose and principles of Data Protection and to ensure that it has guidelines and procedures in place which are consistently followed.

Failure to adhere to the Data Protection Act 1998 is unlawful and could result in legal action

being taken against Fertility Massage Therapy.

**Principles**

The Data Protection Act 1998 regulates the processing of information which includes the obtaining, holding, using or disclosing of such information, and covers computerised records as well as manual filing systems.

Data users must comply with the data protection principles of good practice which underpin

the Act. To comply with the law, information must be collected and used fairly, stored safely

and not disclosed to any other person unlawfully.

To do this Fertility Massage Therapy follows the eight Data Protection Principles outlined in the Data Protection Act 1998, which are summarised below:

I. Personal data will be processed fairly and lawfully

II. Data will only be collected and used for specified purposes

III. Data will be adequate, relevant and not excessive

IV. Data will be accurate and up to date

V. Data will not be held any longer than necessary

VI. Data subject’s rights will be respected

VII. Data will be kept safe from unauthorised access, accidental loss or damage

VIII. Data will not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

The principles apply to “personal data” which is information held on computer or in manual

filing systems from which they are identifiable. Fertility Massage Therapy who process or use any personal information in the course of their duties will ensure that these principles are followed at all times.

**Purposes**

Fertility Massage Therapy obtains personal data (such as names, addresses, and phone numbers) from students and clients. This data is obtained, stored and processed solely to assist Fertility Massage Therapy in the efficient running of services. Personal details supplied are only used to send material that is potentially useful. Most of this information is stored on the organisation’s database.

Fertility Massage Therapy obtains personal data and information from clients and students in order to provide services. This data is stored and processed only for the purposes outlined in the agreement and service specification signed by the client/ student.

Financial data is never stored or recorded; all participants are requested to make financial payments via BACS (online payment), cheque, debit or credit card. Payments made by debit/credit card are taken via WorldPay, whereby an email link is sent to them to complete and card details are never taken or stored.

**Consent**

Personal data is collected over the phone and using other methods such as e-mail. During this initial contact, the data owner is given an explanation of how this information will be used. Written consent is not requested as it is assumed that the consent has been granted when an individual freely gives their own details.

Personal data will not be passed on to anyone outside the organisation without explicit consent from the data owner unless there is a legal duty of disclosure under other legislation.

Contact details held on the organisation’s database may be made available to groups/ individuals outside of the organisation upon prior agreement. Individuals are made aware of when their details are being collected for the database and their verbal or written consent is requested

**Access**

The contact details of students will only be made available to Fertility Massage Therapy. Contact details of students will not be passed on to anyone outside the organisation without their explicit consent.

Any other information supplied on application will be kept in a secure filing cabinet and is not accessed during the day to day running of the organisation.

All confidential post is opened by the addressee only.

**Accuracy**

Fertility Massage Therapy will take reasonable steps to keep personal data up to date and accurate. Personal data will be stored for 6 years after an student has participated on the course.

**Storage**

* Personal data is kept in paper-based systems and on a password-protected computer system.
* Every effort is made to ensure that paper-based data are stored in organised and secure systems.
* Fertility Massage Therapy operates a clear desk policy at all times.

**Use of Photographs**

Where practicable, Fertility Massage Therapy will seek consent from individuals before displaying photographs in which they appear. If this is not possible (for example, a large group photo), the organisation will remove any photograph if a complaint is received. This policy also applies to photographs published on the organisations website or in the Newsletter.