

Privacy Notice

1. The Summit Clinic provides psychology, psychotherapy and expert witness services based at 40 Highgate West Hill, London N6. This privacy notice provides information about the personal information we process about you, as a data controller, in compliance with the General Data Protection Regulation (GDPR).
2. The Summit Clinic is committed to ensuring that your personal data is stored and processed securely. We follow guidelines and recommendations in accordance with our professional registration and relevant regulatory bodies. Further information can be found in our Data Protection Policy, which complies with the requirements detailed in the Data Protection Act (1998) and the General Data Protection Regulations (2018). Document available on request.
3. Please contact The Summit Clinic at reachus@thesummitclinic.co.uk with any questions or requests about the personal information we process.

Your rights

4. We are committed to protecting your rights to privacy. They include:
 - Right to be informed about what we do with your personal data;
 - Right to have a copy of all the personal information we process about you;
 - Right to rectification of any inaccurate data we process, and to add to the information we hold about you if it is incomplete;
 - Right to be forgotten and your personal data destroyed;
 - Right to restrict the processing of your personal data;
 - Right to object to the processing we carry out based on our legitimate interest.

The personal data we process, why we process it, where it comes from and the legal basis for doing so

In providing you with our services, The Summit Clinic will need to handle your personal information. It is a requirement of our professional registration and professional indemnity and, according to the legitimate interests of provision of our services, to keep documentation of your personal data to allow us to provide assessment and therapy services.

We hold information about you in a variety of forms including written notes, emails, questionnaires, letters and invoices. Your information will only be collected, managed and stored for the purposes of us providing you with agreed services.

Legal and Clinical

5. We process the personal data of individuals who are obtaining legal advice or are engaged in a legal dispute, and also the personal data of witnesses and others with links to the issues in the case.
6. We process the personal data of individuals who are seeking a psychological assessment and /or treatment.
7. The personal data may include:
 - Names, contact details and dates of birth;
 - Financial information and bank details;
 - Health information;
 - Information about race, ethnic origin and sex;
8. The personal data may be provided by a person or company instructing us in relation to legal issues, by a person who has made a referral to our service, or by the person seeking a service themselves.
9. We process the data because it is in our legitimate interests as a psychology and psychotherapy service to do so. We need to see and analyse documents containing this information in order to provide our expert advice, assessment and treatment.
10. In relation to any special category personal data, such as health records or information concerning, race, ethnic origin, or sex, we rely on our legitimate interest and may also rely on the legal claims basis for processing this data.

11. In relation to any special category data we also process data as it is necessary for the purposes of preventative or occupational medicine.
12. In many cases, an individual has consented to the transfer of their personal data to us. Where an individual has consented, he or she may easily withdraw it by notifying *The Summit Clinic* at the *email address* above.

Other personal data

13. We also process personal data pursuant to our legitimate interests in running our business such as:
 - Invoices and receipts;
 - Accounts, VAT and tax returns;
 - Insurance policies and related documents;
14. As an employer, we process personal data further to contracts of employment with our employees. The information includes:
 - Names, addresses and contact details;
 - Pay and bank details, pay slips;
 - Curricula vitae, contracts of employment, references and appraisals;
 - Health information (in reliance on the occupational health exemption contained in the Data Protection Act 2018)
15. We process personal data further to Licence agreements and in relation to room rental arrangements. The information includes:
 - Names, addresses and contact details;
 - Pay and bank details, pay slips;
 - Professional indemnity and public liability documentation
 - Professional registration or accreditation documents

Website information

We use google analytics as a way to collect standard login information and other details that help us to understand visitor behaviour patterns when someone visits our website www.thesummitclinic.co.uk. None of this information is processed in a way that could identify someone. When people use the contact form to get in touch via the website, the information is securely stored and only used, specifically for the purposes of the enquiry.

Retention period

We will hold information about you for as long as you are with our service and for different retention periods thereafter, dependent on our professional and legal responsibilities

16. Personal data in legal cases is retained, where necessary, for 6 years in compliance with our professional indemnity obligations. Where this is not necessary, it is destroyed on the conclusion of the case.
17. Personal data in adult psychology or psychotherapy cases is retained for 7 years in compliance with our professional indemnity obligations, or longer on request.
18. Personal data in child psychology or psychotherapy cases is retained until 25th birthday or 26th if a patient was 17 at conclusion of treatment, and always for a minimum for 10 years, in compliance with our professional indemnity obligations.
19. Administrative data is retained for up to 6 years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner. Where it is not necessary to retain the data for 6 years, it is destroyed as soon as possible.
20. Personal data relating to employees who have left our employment is also retained for up to 6 years as necessary. This is the time limit for bringing a breach of contract claim. In some case we destroy it as soon as the employee leaves.

Whom do we share personal data with?

All services at The Summit Clinic are confidential. We will not share your information unless we judge that there is a serious risk of harm to yourself or others, or with your written consent, or when we are legally obliged to do so. Confidential information is restricted only to those who have a reasonable need to access it.

21. We share personal data internally strictly on a need to know basis.

22. We do not share personal data with anyone external to the organisation, other than with:

- Those who have instructed us as an expert witness
- Outsourced service providers such as digital dictation services, pursuant to GDPR compliant written contracts.
- HMRC and the VAT Commissioner as they require.
- With others pursuant to a court order.
- With others in compliance with our statutory duties or professional indemnity obligations.

Where do we keep the information?

23. Special category data and personnel files held electronically are encrypted with restricted access. Hard copy special category and other personal data is stored securely with restricted access.

24. We use personal computers for the purposes of our normal business activities and for storing some personal data. All computers are password protected and hard drives are encrypted.

25. In some case we may use cloud based storage services. All such services meet GDPR requirement and data stored on these services is encrypted.

26. We may make hand written notes to serve as an aide memoire and to assist us in providing a service to you. All paper based records are kept in locked filing cabinets. We send paper copies of invoices to our accountant for the purposes of processing our annual accounts.

Who to contact if I have any concerns about how my data is being managed

27. If you have any concerns about the way your personal information has been processed, please contact The Summit Clinic above. If we are unable to resolve your concerns you have a right to complain to the ICO - <https://ico.org.uk/for-the-public/raisingconcerns>.

Policy prepared by: Brigid Hekster, Clinical Psychologist

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