

Clinical Psychology Enterprise Limited

PO Box 17497, Birmingham, B13 3PJ

T: 07470 150 952 E: enquiries@cpe.uk.com W: www.cpe.uk.com



Clinical Psychology Enterprise Limited Privacy Policy

Clinical Psychology Enterprise Limited (CPE) based at PO Box 17497, Birmingham, B13 3PJ, provides psychological services to individuals, agencies and the Courts. This privacy notice provides information about how personal data we collect is processed by us, in order to comply with the General Data Protection Regulations (GDPR).

Our ICO registration number is ZA085012

Please contact Dr Caroline Formby (enquiries@cpe.uk.com) with any questions or requests about the personal information we process.

Further information on the following topics is provided below:

Personal data we collect, where this comes from, why we process it and the legal basis for doing so:

Information collected may include:

- Your name, date of birth, contact details (and name and contact details of parent's for children).
- Correspondence in relation to your referral.
- Health information (inc. medical / psychological history).
- Occupational history
- Criminal history.
- Presenting difficulties (mental and physical health, other stressors and lifestyle factors).
- Psychometric raw data and scores.
- Information about race, ethnic origin and sex.

We collect information about you because you are a patient or client of ours or you have agreed to be assessed by us in relation to legal proceedings. In therapy we record details discussed during assessment and treatment so that your therapist can keep a track of your treatment needs and progress your treatment accordingly. Some personal data may be provided by your health insurance providers and other data we will collect from yourself (and any family members / friends that you consent to being involved in your therapy).

In legal cases we obtain information on yourself and others involved in the case via direct discussion with yourself and via documentation provided by instructing parties (usually solicitors), which may include your medical records and other expert reports.

We collect, analyse and process this data because it is in our legitimate interests to do so as your assessor and/or treating therapist or expert witness in legal proceedings in which you are involved. We may need to see and analyse this information in order to carry out an assessment of your needs, to deliver psychological therapy or provide expert witness services, including a report to the Court.

Other personal data:

We also process personal data pursuant to our legitimate interests in running our business such as:

- Invoices and receipts
- Accounts, VAT and tax returns.

How do we collect your data?

You directly provide CPE with most of the data we collect. We collect data and process data when you:

- Register online or place a request for any of our products or services.
- Voluntarily complete a customer survey or provide feedback on any of our messages or via email.
- Use or view our website via your browser's cookies.

Whom do we share personal data with?

We take your privacy very seriously. We share data internally on a strictly 'need to know basis'.

Special category data held electronically is encrypted with restricted access. Hard copy data is also stored securely with restricted access.

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

- Health insurance providers for the purposes of billing and to provide treatment updates where necessary;
- Relevant authorities when the information concerns risk of harm to yourself, or others. We will discuss such a proposed disclosure with you unless we believe that to do so could increase the risk.
- In legal cases, where assessment or treatment is undertaken as part of these proceedings, details will be shared with legal services. For treatment which is not part of legal proceedings documents may be required by legal services. Your written consent will be sought for this.
- Services providers such as administrative support workers / typists, who have sign confidentiality contracts binding them to comply with GDPR;
- Accountants, HMRC and the VAT Commissioner as they require;
- Under legal obligation to a Court Order.

How do we store your data?

All personal information provided is stored in compliance with EU General Data Protection Regulations (GDPR) rules. We do not keep your data for longer than is necessary.

Administrative data is retained for up to 6 years as necessary, in the unlikely event there are queries from HMRC and the VAT commissioner.

Personal data is retained, where necessary, for 7 years in compliance with our professional indemnity obligations.

Where it is not necessary to retain the data for this period, it is destroyed as soon as possible.

CPE securely stores your data on servers provided by UKFast, an ISO 27001 accredited, a PCI DSS compliant business and secured to Government IL4 expectations, providing secure data servers (<https://www.ukfast.co.uk/secure-hosting.html>)

CPE will keep your contact details data for three years, unless you request for it to be removed. Once this time period has expired, we will delete your data by a secure erase procedure.

What are your data protection rights?

CPE would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request CPE for copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that CPE correct any information you believe is inaccurate. You also have the right to request CPE to complete the information you believe is incomplete.
- The right to erasure – You have the right to request that CPE erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that CPE restrict the processing of your personal data, under certain conditions.
- The right to object to processing – You have the right to object to CPE’s processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that CPE transfer the data that we have collected to another organisation, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our e-mail.

Changes to our privacy policy

CPE keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 8 October 2019.

Further information, queries or complaints:

If you have any concerns about the way your personal information has been processed, please contact Data Controller:

Dr Caroline J. Formby,
Clinical Psychology Enterprise Limited, PO Box 17497, Birmingham, B13 3PJ.

enquiries@cpe.uk.com

If you are not satisfied with the response, and wish to make a complaint, you may contact the Information Commissioners Office on 0303 123 113.