

# **easibirthing Privacy Policy for professional training courses**

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection. It came into effect on 25th May 2018.

GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that individuals data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. easibirthing is committed to protecting the rights and freedoms of individuals with respect to the processing of clients' personal data. The basis on which I keep client data is that of "Legitimate Interests". This means that the data is necessary for me to fulfil the contract that we have together (ie to provide training) and that it is data that you would reasonably expect me to hold and use.

The Data Protection Act gives individuals the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

## **GDPR includes 7 rights for individuals**

### **1) The right to be informed**

easibirthing is a registered trademark and company owned and managed by Sharon Mustard. Sharon is a registered UKCP hypno-psychotherapist As an accredited member of the 'UK Council for Psychotherapy', a fellow of the 'National Society of Hypnosis and Psychotherapy', and the 'Complementary and Natural Healthcare Council', she is required to abide by their Code of Ethics and Practice.

We provide training for hypnotherapists and individuals currently in training to become hypnotherapists in the subjects of hypnosis for fertility, pregnancy, childbirth, post-natal mental health and parenting.

In order to provide this training, we are required to collect certain details of individuals applying for training. We need to know names, telephone numbers, current address and emails and whether you are a qualified hypnotherapist or in training. This is in respect of ensuring you are suitably qualified and therefore eligible for attending our training and to maintain a register of who has been trained in the past.

easibirthing use an accountant, who will have access only to names attached for payments and the purposes of payments. His name is Andrew Jenvey, AIMS Accountants for Business, 8 Belbins Business Park, Cupernham Lane, Romsey SO51 7JF

easibirthing uses Cookies on its website to collect data for Google Analytics, this data is anonymous. Cookies are small pieces of information that are stored by your browser on your device's hard-drive. They are used to distinguish individual users, and help us improve our website. Analytics and search engines providers that assist us in the improvement and optimisation of our site may collect data about your IP and computer set up. To read more please have a look at our Cookies policy.

## **2) The right of access**

Sharon Mustard, easibirthing, Office 5 Enterprise House, Boathouse Meadow Business Park, Cherry Orchard Lane, Salisbury, SP2 7LD is the named data controller for easibirthing.

At any point an individual can make a request relating to their data and easibirthing will need to provide a response (within 1 month).

## **3) The right to erasure**

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However easibirthing has a legal duty to keep individual details for a reasonable time\*, easibirthing obtain these records for 20 years after attending easibirthing training. This data is archived electronically and in paper form securely onsite and shredded after the legal retention period.

## **4) The right to restrict processing**

Clients can object to easibirthing processing their data. This means that records can be stored but must not be used in any way, for example statistical reports or for research.

## **5) The right to data portability**

easibirthing requires data to be transferred from one IT system to another; from easibirthing to the National College for Hypnosis and Psychotherapy to enable them in awarding of qualification certificates. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

## **6) The right to object**

Individuals can object to their data being used for certain activities like marketing or research. easibirthing will only use your details with your permission as part of a secure mailing list to email you details of future easibirthing courses that may be of interest to you. These details will never be used for any other form of marketing nor be given to another organisation for marketing their own products and services.

## **7) The right not to be subject to automated decision-making including profiling.**

Automated decisions and profiling are used for marketing based organisations. easibirthing does not use personal data for such purposes.

## **Storage and use of personal information**

All paper copies of individual training records are kept in a locked filing cabinet in easibirthing offices (accessed only by Sharon Mustard). All information is confidential and these records

remain on site at all times, including for archiving. These records are shredded after the retention period.

easibirthing collects personal data every year including; names, telephone numbers and email addresses of those on the waiting list for a course or who have asked to be informed of future courses via a mailing list.

easibirthing stores personal data held visually in birth stories, photographs or video clips or as sound recordings, only where full written consent has been obtained. No full names are stored with images in photo albums, displays, on the website or on easibirthing's social media sites.

Data of names, email addresses, telephone numbers is also held electronically on a computer hard drive and on a cloud storage system. Access to all office computers, cloud accounts and to websites is password protected.

GDPR means that easibirthing must;

- \* Manage and process personal data properly
- \* Protect the individual's rights to privacy
- \* Provide an individual with access to all personal information held on them

If there is any breach of data security, easibirthing will give full details to the Information Commissioners Office and any person affected within 72 hours of the breach and do all possible to minimise any potential impact.

This Policy was adapted at easibirthing on 25th April 2018