**Data Protection Policy**

The Company takes the security and privacy of your data seriously. We need to gather and use information or ‘data’ about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (the ‘2018 Act’) and the EU General Data Protection Regulation (‘GDPR’) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

The Company has measures in place to protect the security of your data in accordance with our Data Security Policy. The Company will hold data in accordance with our Data Retention Policy that states ‘records will be retained for a period of at least five years from the date of treatment and, in the case of a minor, for a period of at least five years after that minor would attain majority’.

The Company will only hold data for as long as necessary for the purposes for which we collected it. The Company is a ‘data controller’ for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This policy explains how the Company will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing, or storing personal data during our relationship with you.

**Data Protection Principles:**

Personal data must be processed in accordance with six ‘Data Protection Principles.’ It must:

• be processed fairly, lawfully, and transparently

• be collected and processed only for specified, explicit and legitimate purposes

• be adequate, relevant, and limited to what is necessary for the purposes for which it is processed

• be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay

• not be kept for longer than is necessary for the purposes for which it is processed

• be processed securely.

The Company is accountable for these principles and must be able to show that we are compliant.

**How we define personal data:**

‘Personal data’ means information which relates to a living person who can be identified from that data (a ‘data subject’) on its own, or when taken together with other information which is likely to

come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials. The company uses encrypted email solutions (and attachments are password protected)

for sending sensitive, personal information. All storage of personal data is securely locked, encrypted and password protected.

This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, a social worker, or a credit reference agency), or it could be created by us. It could be provided or created while providing services or after its termination. We may collect and use the following types of personal data about you:

**Service users’ special categories:**

1. family composition

2. history of difficulties

3. therapeutic interventions

4. parenting history

5. legal orders / compliance details, any criminal convictions, and offences

6. your sex life or sexual orientation

7. demographic information: age, gender, address, contact details, etc

8. your racial or ethnic origin

9. your political opinions

10. your religious or philosophical beliefs

11. your trade union membership

12. your genetic or biometric data

13. your health

We may hold and use any of these special categories of your personal data in accordance with the law.

**How we define processing:**

‘Processing’ means any operation which is performed on personal data such as:

• collection, recording, organisation, structuring, or storage

• adaption or alteration

• retrieval, consultation, or use

• disclosure by transmission, dissemination or otherwise making available

• alignment or combination

• restriction, destruction, or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

**How will we process your personal data?**

The Company will process your personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.

We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

**What your Rights are?**

- the right to be informed

- the right of access

- the right to rectification

- the right to erasure

- the right to restrict processing

- the right to data portability

- the right to object

- the right not to be subject to automated decision-making

Clarification may be obtained from the data controller: Parminder Kaur Soar, email address: [parminder@soaringhigh.co.uk](mailto:parminder@soaringhigh.co.uk) telephone number: 07814963599 website address: [www.soaringhigh.co.uk](http://www.soaringhigh.co.uk)

Please confirm you have read, understood, and agree with this policy.

**Consent:**

You are consenting to Soaring High contacting you with the following (please tick the statements which apply):

1. To provide services / update you about our services, appointments, or changes
2. To keep you informed about Soaring High news, events, and activities (you can unsubscribe at any time). Such communications will be occasional.
3. To share your contact details with relevant practitioners as detailed on the service agreement (and safeguarding policy).

I consent to Soaring High (tick all which apply)

1. contacting me by email
2. contacting me by telephone
3. contacting me through business secure / private social media platform

One of the requirements of the legislation is to check the accuracy of information being held. Please complete the following contact information:

**Enter details below:**

Name:

Contact telephone number:

Email address:

Address:

Signed:

Date:

You can withdraw or change your consent at any time by contacting the Data Controller. Please note that all processing of your personal data will cease once you have withdrawn consent, other than where this is required by law and where it is required to fulfil the legal basis of the contract for services, but this will not affect any personal data that has already been processed prior to this point.

You have the right to complain to the Information Commissioner. You can do this by contacting the Information Commissioner’s Office directly. Full contact details including a helpline number can be found on the Information Commissioner’s Office website ([www.ico.org.uk](http://www.ico.org.uk)) This website has further information on your rights and our obligations.