

Privacy policy - Adult

Introduction

Recolo UK Ltd is a private, specialist psychology practice. Our purpose is to provide expert, high quality and effective community neuropsychological rehabilitation to children, young people and their families.

As an essential part of our work, we collect and manage client data. We understand that our work requires the sharing of personal and at times, highly sensitive information and we value the sharing of this information. We understand that this is a personal account and as such, relates only to individual family settings.

At Recolo, we take our data security responsibilities very seriously and we are registered with the Information Commissioners Office (ICO) for both controlling and processing data. Our registrations number is Z2842947. We adhere to the UK data protection legislation.

In order that you are reliably informed about how we operate, we have developed this privacy notice (also known as a Fair Processing Notice or FPN), which describes the ways in which we collect, manage, process, store and share information about you as a result of you visiting this site. The privacy notice also provides you with information about how you can have control over the use of your data.

If you have any comments or queries regarding our use of your data, please contact us at care@recolo.co.uk. Alternatively, you can write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF

What Information Do We Collect About You?

In general terms, we seek to collect information about you so that we can:

- Administer our relationship with you, provide services and respond to enquiries
- Enable business development including sending information about training, etc
- Process applications for employment
- Deliver requested information to you about our services
- Ensure the billing of any procured services and obtain payment
- Process and respond to any complaints
- Enable us to meet our legal and other regulatory obligations imposed on us
- Audit usage of our website

The information that we need for these purposes is known as your “personal data”. This includes your name, home address, email address, telephone and other contact numbers and financial information. We collect this in a number of different ways. For example, you may provide this data to us directly online or over the telephone, or when corresponding with us by letter.



We also process sensitive classes of information that includes:

- Physical or mental health details

We will always seek your permission if we need to record any of your sensitive personal data on our systems.

How Will We Use the Information?

Please see the specific purposes listed in the table below. This table also explains the legal basis for processing your data, linked to each processing purpose and any external sharing.

Why is the (data) held by Recolo?	Details of the specific data Recolo holds			
	On what basis is Recolo 'processing' the information?			
	Data type	Basis to process	Provision of consent	Third party organisations with whom data is shared
Marketing purposes	Business contact name, email address, organisation	To seek explicit consent prior to sending individuals the information and in line with preferences.	Written and dated specific opt in	none
Training events	Business contact name, email address, organisation	To seek explicit consent prior to sending individuals the information and in line with preferences.	Written and dated specific opt in	none
Employment contract requirements	Name, address, bank details, tax code, references	To meet the requirements of a contract.	Processing notification provided as addition to contract t&c's.	Government VAT and tax inspectors, external auditors, internal auditors.
Sub-contractor contract requirements	Name, address, bank details, HCPC and DBS registration numbers, insurance	To meet the requirements of a contract.	Processing notification provided as addition to contract t&c's.	Government VAT and tax inspectors, external auditors, internal auditors.
Complaints	Contact name, email address, organisation	To meet a legal obligation	To process and respond to complaints.	none
Employment and sub-contractor contract requirements	Name, address, HCPC registration number as needed	To conduct human resource administration to include assessing suitability, eligibility and/or fitness to work.	To fulfil contractual obligations, including action before entering into a contract.	Disclosure and Barring Service.
Special category data	Name, address, personal health details	To seek explicit consent prior to starting work that is part of the exercising of a legal claim	Written and dated specific consent form completion	Commissioning solicitor, case manager and MDT
Digital technical	IP addresses	To monitor and record information relating to the use of our services, to include our website.	To meet a legitimate interest to improve the website services	Web service providers and cookie providers.

Your Rights

Under the terms of data protection legislation, you have the following rights as a result of using this website:

- Right to Be Informed

This privacy notice fulfils our obligation to tell you about the ways in which we use your information as a result of you using this website.

- Right to Access

You have the right to ask us for a copy of any personal data that we hold about you. This is known as a "Subject Access Request". You can obtain this information at no cost. We will send you a copy of the information within 30 days of your request.

To make Subject Access Request, please write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF

- Right to Rectification

If any of the information that we hold about you is inaccurate, please contact us in the following ways:

- a) Email care@recolo.co.uk
- b) you can write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF

- Right to Be Forgotten

From 25 May 2018, you can ask that we erase all personal information that we hold about you. Where it is appropriate that we comply, your request will be fully actioned within 30 days. For further information, please write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF or care@recolo.co.uk

- Right to Object

You have the right to object to:

The continued use of your data for any purpose listed in section 3 above for which consent is identified as the lawful basis for processing i.e. you have the right to withdraw your consent at any time. The continued use of your data for any purpose listed in section 3 above for which the lawful basis of processing is that it has been deemed legitimate.

- Right to Restrict Processing

If you wish us to restrict the use of your data because (i) you think it is inaccurate but this will take time to validate, (ii) you believe our data processing is unlawful but you do not want your data erased, (iii) you want us to retain your data in order to establish, exercise or defend a legal claim, or (iv) you wish to object to the processing of your data, but we have yet to determine whether this is appropriate, please write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF



If you would like to move, copy or transfer the electronic personal data that we hold about you to another organisation, please write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF

- Rights Related to Automated Decision-Making

This is not something that Recolo does but if you have any queries about this, please write to us at Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF

- Is the Processing of Information Likely to Cause Individuals to Object or Complain?

Recolo UK Ltd is not aware of any justifiable reasons that would constitute a legitimate reason for objecting or complaining about the way we process or control information.

- How Long Will We Retain Information For?

Recolo UK Ltd will typically retain information for a period of seven years but where there is any query regarding the capacity of the individual client in terms of decision making, British Psychological Society guidelines advise twenty years. This is due to regulatory reasons and to ensure our business records are adequate to maintain the requisite levels of insurance to protect our clients and non-clients.

- Overseas Transfers

None of the information that we collect process or store as a result of this website is transferred outside of the European Economic Area (EEA). This includes information that is exchanged with any third-party organisation as described above.

Data Privacy and Security

At Recolo UK Ltd, we ensure that the systems that hold and protect our data fit for purpose in line with our data protection obligations, as well as our commitment to working well with our clients. Where any concerns, risks or issues are identified we will conduct relevant impact assessments in order to determine any mitigating actions that are necessary.

We work together with our IT infrastructure partner, our associates and staff to ensure that our systems best protect the availability, confidentiality and integrity of all our physical and digital information assets. This helps us to:

- Protect against potential breaches of confidentiality;
- Ensure all IT equipment is protected against damage, loss or misuse;
- Increase awareness and understanding of the requirements of information security, and the responsibility of our colleagues to protect the confidentiality and integrity of the information that they handle; and
- Ensure the optimum security of our website.

Location Tracking Via Our Website

Geo-location tracking, which shows us where you are in the UK, is not used on this website.



Cookies

Please also be advised that when you visit this website, cookies will be used to collect information about you such as your Internet Protocol (IP) address which connects your computer or mobile device to the Internet, and information about your visit such as the pages you viewed or searched for, pages response times, download errors etc. We do this so that we can measure our website's performance and make improvements in the future. Cookies are also used to enhance this website's functionality and personalisation, which includes sharing data with third party organisations. You can control this by adjusting your cookies settings.

General

Questions and comments regarding this Privacy Notice are welcomed, and should be sent to Recolo UK Ltd, FAO: Registered Data Controller, 10 Harley Street, London, W1G 9PF. Alternatively, you can email care@recolo.co.uk

You can also contact our Registered Data Controller if you have any concerns or complaints about the ways in which your personal data has been handled as a result of you using this website.

Alternatively, you have the right to lodge a complaint with the Information Commissioner's Office who may be contacted at Wycliffe House, Water Lane, Wilmslow SK9 5AF or <https://ico.org.uk>.