



ADHD 360 Privacy Policy

Our contact details

Name: ADHD 360

Address: First Floor, Unit 5, Deepdale Enterprise Park, Deepdale Lane,
Nettleham, Lincoln, LN2 2LL

Phone Number: 01507 534181

E-mail: enquiries@adhd-360.com

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Collection of personal information

At ADHD 360 we collect personal information for these main reasons:

- Providing treatment
- Providing advice
- Improving our service
- Part of our normal business

NHS Care Record Guarantee

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS, what control the patient can have, and the rights individuals have to request copies of their data and how data is protected under the Data Protection Act 1998. Our privacy policy and data protection arrangements will honour the Guarantee.

Further information on the Care Record Guarantee can be found by following this link:

<https://www.nhs.uk/nhsengland/thenhs/records/healthrecords/documents/patientguidanceebooklet.pdf>

Our lawful basis for processing personal information

- Our lawful basis for processing and storing personal information is one of “legitimate interest” (under article 6 of GDPR). ADHD 360 cannot adequately deliver a service to our patients without processing their personal information. As it is both a necessity for our service delivery and of benefit to the patient, we have a legitimate interest to process and store their data.
- Data relating to an individual’s health is classified as “special category data” under section 9 of GDPR. The regulations specify that health professionals that are “legally bound to professional secrecy” may have a lawful basis for processing this data. ADHD 360 clinicians are legally bound to keep client information confidential, and it is under this condition that we process and store personal information.

The type of personal information we collect

We currently collect and process the following personal information:

- Names
- Dates of Birth
- Postal Addresses
- Email addresses
- Bank details
- Diagnosis details
- Treatment and prescription details
- Details of other health professionals involved in the treatment of our patients.
- Appointment details

When using our patient app we also collect the following Log Data:

- Your device Internet Protocol (“IP”) address
- Device name
- Operating system version
- Configuration of the app when utilizing our Service
- Time and date of your use of the Service
- Other statistics

How we collect personal information

Most of the personal information we process is provided to us directly by you via:

The ADHD 360 website

- Email
- Chat
- Telephone
- Videoconference

You may use the ADHD 360 website without providing any personal information, but if you wish to make an enquiry or contact us via the website or by email, you are requested to provide relevant contact details such as your name, email address and contact phone number to enable us to respond to your enquiry.

Who we collect personal information from

- Information about the patient(s) will be collected via spoken or written media from clients / parents / carers.
- With (parental) consent, information may also be collected from other professionals working with our patients.
- Information may also be taken about family members where this relates to our patients - e.g. contact details for parents and any relevant medical / developmental history.
- You may add comments or queries which might also contain personal information.
- If the patient is subsequently seen by ADHD 360, these details may be added to their personal records.
- Our website contains links to other internet sites that are outside our control and are not covered by this privacy policy. We are not responsible for any data that you provided through any such websites.

We will not use or share your information with anyone except as described in this Privacy Policy. If your enquiry does not result in treatment by ADHD 360, then this personal information will be deleted once your enquiry has been dealt with.

How we use personal information

ADHD 360 uses personal information:

- To prepare, plan, and provide therapy services appropriate to the patient's needs.
- To communicate with the client by post, email, telephone or text message in relation to:
 - Confirming and preparing for appointments
 - General communication in between appointments
 - Sending you reports and programmes for the patient, which are password-protected
 - Copying the client into communications with other professionals about the patient
 - Sending resources
 - Sending invoices
 - For clinical audit to assess and improve ADHD 360's service. Results of audits are always presented with all client identities removed.
 - For management and administration – for example, surnames of clients are included in our password-protected database.
- For prescribing using our partner pharmacy we may share personal data with Broadway Pharmacy, or other pharmacies chosen to dispense appropriate medication.

Unless we are required to do so by law, we will not disclose any personal information collected to any person other than as set out above.

ADHD 360 does not employ agents to process personal data – for example, specialist mailing companies to send out communications, with the exception of our long standing Marketing partner, Disrupt, who undertake our marketing and have appropriate access to relevant data for that sole purpose.

ADHD 360 does not give or sell client details to any third parties other than allied health professionals.

Whenever personal identifiers are not needed for these tasks, ADHD 360 removes them from the information it uses.

How we store personal information

- All information about the client, the patient, and their therapy is stored securely in a password-protected, encrypted database on ADHD 360's bespoke Chrysalis system.
- We do not retain any paper-based, confidential information (such as assessments and case notes). These are digitised and are stored on Chrysalis.
- All records will only be retained for the minimum time necessary and will be deleted from our system for a maximum of 6 years after your relationship with us comes to an end.
- Email correspondence and invoices will be deleted from ADHD 360's systems after 5 years after your relationship with us comes to an end.

Consent

With consent, information about your needs will be shared with other professionals involved in the patient's care when it is in the patient's best interests.

A record of the client's consent is kept within the patient's case notes.

Breach procedure

If any confidential data is lost, damaged or inappropriately accessed, ADHD 360 follows a breach procedure.

- ADHD 360 staff member notifies Data Protection Champion.
- ADHD 360 seeks advice from the ICO about how to act.
- ADHD 360 might contact the client if advised to do so.

UK data protection law and EU General Data Protection Regulations

Data Protection Law lays down wide-ranging rules backed up by criminal sanctions for the processing of information about identifiable, living individuals. It also gives individuals certain rights in relation to personal data held about them by others. ADHD 360 is registered with the Information Commissioner's Office (ICO) as a Tier 1 data controller.

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at enquiries@adhd-360.com if you wish to make a request.

Security

We value your trust in providing us your Personal Information, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

Links to Other Sites

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to make the necessary actions.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at enquiries@adhd-360.com.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>