**Data Protection Policy**

Solace Holistic Centre is committed to a policy of protecting the rights and privacy of clients in accordance with General Data Protection Regulation.

Solace Holistic Centre commits to:

* comply with both the law and good practice
* respect individuals’ rights
* be open and honest with individuals whose data is held

Solace Holistic Centre may hold data for the following purposes:

* Provision of direct healthcare
* Case histories

There are six data protection principles that are core to the General Data Protection Regulation. Solace Holistic Centre will make every possible effort to comply with these principles at all times in our information-handling practices. The principles are:

1. **Lawful, fair and transparent**

Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.

1. **Limited for its purpose**

Data can only be collected for a specific purpose.

1. **Data minimisation**

Any data collected must be necessary and not excessive for its purpose.

1. **Accurate**

The data we hold must be accurate and kept up to date.

1. **Retention**

We cannot store data longer than necessary.

1. **Integrity and confidentiality**

The data we hold must be kept safe and secure.

# Responsibilities

Joyce O Sullivan is the data controller for all personal data held in Solace Holistic Centre and is responsible for:

* Analysing and documenting the type of personal data held
* Checking procedures to ensure they cover all the rights of the individual
* Identifying the lawful basis for processing data
* Ensuring consent procedures are lawful
* Implementing and reviewing procedures to detect, report and investigate personal data breaches
* Storing data in safe and secure ways

# Data Recording, Security and Storage

## Data accuracy and relevance

Solace Holistic Centre will ensure that any personal data processed is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless the individual concerned has agreed to this or would otherwise reasonably expect this.

## Data security

Solace Holistic Centre will keep personal data secure against loss or misuse.

## Storing data securely

* In cases when data is stored on printed paper, it will be kept in a secure place where unauthorised personnel cannot access it
* Printed data will be shredded when it is no longer needed
* Data stored on a computer will be protected by strong passwords that are changed regularly. A password manager will be used to create and store passwords.
* Data stored on CDs or memory sticks will be encrypted or password protected and locked away securely when they are not being used

## Data retention

Solace Holistic Centre will retain personal data for no longer than is necessary. This shall be in accordance with the guidelines of our professional association, IMTA and NRRI.