

ROTHERWICK LIMITED customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Data Controller

- Dr Reenee Singh
- Telephone 07891992061
- Email reeneesingh@gmail.com

Data Processor

- Dr Reenee Singh PA
- Email reeneesingh.practice@gmail.com

What information we collect, use, and why

We collect or use the following information to provide patient care, services, pharmaceutical products and other goods:

- Name, address and contact details
- Date of birth
- Payment details (including card or bank information for transfers and direct debits)
- Insurance policy details
- Records of meetings and decisions

We also collect the following special category information to provide patient care, services, pharmaceutical products and other goods. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sex life information
- Sexual orientation information
- Health and wellbeing information, including therapy notes and assessments

We collect or use the following information for safeguarding or public protection reasons:

- Name, address and contact details
- Relevant information from previous investigations
- Records of meetings and decisions

We collect or use the following personal information to comply with legal requirements:

- Name
- Contact information
- Financial information
- Any other personal information required to comply with legal obligations
- Safeguarding information

We also collect the following special category information to comply with legal requirements.

This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sex life information
- Sexual orientation information

We collect or use the following personal information for information updates, marketing or market research purposes:

- Names and contact details
- Marketing preferences
- Personal information used for the purpose of research

We collect or use the following personal information for dealing with queries, complaints or claims:

- Names and contact details
- Addresses
- Payment details
- Purchase or service history
- Customer or client accounts and records
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **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. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to provide patient care, services, pharmaceutical products and other goods are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests - we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Legitimate Interest for Processing Personal Information (ICO-Aligned) As a therapist practising in the UK, I process personal and special category personal data in order to provide safe, effective, and ethical therapeutic care. This includes information such as contact details, relevant background information, health and wellbeing information, session records, assessments, and treatment plans. The processing of this information is necessary and proportionate for the delivery of therapeutic services. It enables me to assess clients' needs, provide appropriate and individualised interventions, monitor progress, maintain continuity of care, manage appointments and professional records, and meet my legal, ethical, and professional obligations, including safeguarding and duty of care requirements. My legitimate interest, in line with Article 6(1)(f) UK GDPR, is to operate a responsible therapy practice that supports the mental health, wellbeing, and safety of clients. Processing this information is essential to provide a professional standard of care and cannot reasonably be achieved without the use of relevant personal information. The benefits of processing personal data include: Ensuring therapy is tailored, effective, and clinically appropriate Supporting client safety, including identifying and responding to risk Maintaining accurate records to support accountability and continuity Enabling clear communication and reliable service delivery These benefits directly serve the interests of clients and contribute to positive therapeutic outcomes. A balancing assessment has been carried out to ensure that these legitimate interests do not override the rights and freedoms of individuals. The potential impact on privacy is minimised by limiting data collection to what is strictly necessary, using the information only for clearly defined therapeutic and administrative purposes, and applying appropriate safeguards. All personal information is handled confidentially, stored securely, and accessed only by authorised individuals where there is a genuine professional need. Data is not

shared with third parties unless there is a lawful basis to do so (such as safeguarding or legal requirements), and it is retained only for as long as required by professional standards or legal obligations. Clients are informed clearly and transparently about how their personal information is used, their rights under UK GDPR, and how they can exercise those rights. Particular care is taken given the sensitive nature of therapeutic information, and respect for privacy, dignity, and autonomy is central to all data-processing activities. Overall, the processing of personal information is fair, lawful, and necessary, and the benefits to clients and the safe delivery of therapeutic care outweigh any minimal risks, which are mitigated through robust data protection practices.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for safeguarding or public protection reasons are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information to comply with legal requirements are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for information updates, marketing or market research purposes are:

- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Legitimate Interest for Information Updates, Marketing, and Market Research (UK V ICO-Aligned) In line with UK GDPR and ICO guidance, I process limited personal information for the purposes of providing service-related information updates, carrying out low-impact marketing, and undertaking market research to improve therapeutic services. This may include basic contact details and non-sensitive feedback about services. My legitimate interest, under Article 6(1)(f) UK GDPR, is to communicate relevant and appropriate information about services, availability, and developments, and to evaluate and improve service quality based on client and user feedback. These activities support transparency, informed choice, and continuous improvement in service delivery. The processing is necessary and proportionate, as effective communication and service evaluation cannot reasonably be achieved without using limited personal information. Where possible, information is anonymised or aggregated, and personal data is used only for clearly defined purposes that individuals would reasonably expect in the context of a therapeutic service. The benefits to individuals include: Receiving relevant and timely information about services Improved services informed by feedback and evaluation Clear and consistent communication supporting informed decisions A legitimate interests assessment (balancing test) has been undertaken to ensure that these activities do not override individuals’ rights and freedoms. The potential impact on privacy is low, as communications are limited, relevant, and non-intrusive. Personal data is not used for profiling, shared for third-party marketing, or used for unrelated purposes. Individuals are provided with clear information about how their data is used and are offered a simple opt-out from non-essential communications at any time, in line with ICO expectations and PECR requirements. All personal information is processed securely and in accordance with UK GDPR principles of fairness, lawfulness, transparency, and data minimisation.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or claims are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you
- Regulatory authorities
- Family members or carers
- Schools, colleges, universities or other education organisations
- Insurance companies

How we keep your information secure

Data is stored and transferred securely in line with UK GDPR principles and professional standards. All electronic records, including clinical notes, are stored in encrypted form and protected by secure systems with restricted access. Any paper records, where used, are kept to a minimum and stored in a locked, secure cupboard accessible only to authorised individuals. Where appropriate, confidential data is anonymised or pseudonymised and stored securely. We take reasonable and proportionate technical and organisational measures to protect personal information from loss, misuse, unauthorised access, disclosure, alteration, or destruction.

How long we keep information

Data Type	Retention Period	Justification (ICO-Aligned)
Client records (adults)	As long as necessary, maximum 7 years.	Legal limitation periods, professional accountability, safeguarding, and continuity of care
Session notes & assessments	as long as necessary, maximum 7 years.	Integral to clinical record and duty of care
Contact details (active clients)	as long as necessary, maximum 7 years.	Required for care delivery and follow-up
Enquiry records (no therapy provided)	as long as necessary, maximum 7 years.	Service administration and follow-up only
Appointment records	as long as necessary, maximum 7 years.	Service management and accountability
Financial & billing records	6 years	HMRC legal requirements
Marketing / information update contact details	Until opt-out or 2 years after last engagement	ICO & PECR expectations; relevance and fairness
Feedback / market research data	12–24 months (anonymised where possible)	Service improvement; minimal privacy impact
Supervision records	as long as necessary, maximum 7 years. (anonymised where possible)	Professional standards and accountability

Data Type	Retention Period	Justification (ICO-Aligned)
Anonymised data	as long as necessary, maximum 7 years.	No longer personal data under UK GDPR

Who we share information with

We do not act as a joint controller with any other organisation. Where third parties process personal data on our behalf, they do so as data processors under appropriate contractual obligations.

Others we share personal information with

- Other health providers (eg GPs and consultants)
- Insurance companies, brokers and other intermediaries
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Professional advisors
- Local authorities or councils
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Professionals within The Child and Family Practice

Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or

- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>