

Privacy Statement

At **NeuroKids Ltd.**, we take your privacy seriously. This document explains how we collect, use, and protect your personal information when providing psychological services.

1. How We Use Your Information

To provide our services, we collect information including your identity, contact details, and relevant personal or medical history.

For therapy cases, this may include:

- Session notes, medical and school records
- Insurance reports
- Correspondence with referring professionals (e.g., GPs, schools, case managers)

NeuroKids ensures that all information is handled in compliance with UK GDPR and the Data Protection Act 2018, alongside professional standards set by the Health and Care Professions Council (HCPC) and the British Psychological Society (BPS).

We may also use your data for accounting, tax, and regulatory purposes. After our financial relationship concludes, we retain relevant financial records only for as long as legally required (e.g., by HMRC).

2. Lawful Basis for Processing

We process personal data under the lawful basis of legitimate interests, as the data is required to provide services expected by the client.

For special category data (e.g., health records), processing is carried out under:

- Article 9(2)(h) UK GDPR – “Provision of health or social care.”
 - Explicit client consent where applicable.
 - Legal obligation when required (e.g., safeguarding concerns).
-

3. Categories of Personal Data Obtained

We collect data primarily from:

- Clients, guardians, or legal representatives
 - Third parties with consent (e.g., medical professionals, schools, solicitors)
 - Public records (e.g., Companies House) where legally justified (e.g., debt recovery)
-

4. Recipients of Data

- Data is used only within NeuroKids for service delivery.
 - Information will not be shared with external parties unless required by law, regulatory bodies, or safeguarding obligations.
-

5. Transfers Outside the UK/EU

- We do not transfer client data outside the UK/EU/EEA for processing.
 - However, we may use secure cloud storage, email services, or video consultation platforms that operate outside these regions. We ensure:
 - Only GDPR-compliant providers are used (e.g., Microsoft 365).
 - Standard Contractual Clauses (SCCs) or UK International Data Transfer Agreements (IDTAs) are in place for third-party providers.
-

6. Data Retention

- Adults: Client records are retained for seven years after the last appointment.
 - Children: Records are retained until the child reaches 25 years old (or seven years post-treatment, whichever is longer).
 - Emails related to active cases will be deleted 30 days after services conclude.
 - Personal injury cases: Records may be held until 30 days after case settlement or seven years, whichever is longer.
-

7. Your Rights Under UK GDPR

Clients have the right to:

- Access personal data (free of charge, within 30 days).
 - Rectify inaccurate data.
 - Request data erasure, where lawful.
 - Restrict processing in specific circumstances.
 - Withdraw consent for data processing (by emailing [contact email]).
 - Lodge a complaint with the Information Commissioner's Office (ICO) if data rights are violated.
-

8. Data Security & Breach Notification

We take appropriate technical and organisational measures to protect personal data, including:

- Secure storage for client records.
- Restricted access policies for sensitive data.
- Regular Privacy Impact Assessments (PIAs) to monitor compliance.
- In case of a data breach, we will notify affected clients and report to the ICO within 72 hours, if legally required.

9. Client Obligations

Providing personal data is voluntary but necessary for service provision. If required data is withheld, NeuroKids may be unable to proceed with treatment.

10. Automated Decision-Making

NeuroKids does not use automated decision-making or profiling based on client data.

11. Additional GDPR Compliance & Data Handling

- GDPR Consent Documentation: Clients must sign a separate Data Consent Form before treatment begins.
 - Third-Party Data Sharing: No personal data will be shared with third parties without signed client/guardian consent, except where legally required.
-

Final Statement

This document represents the full NeuroKids Privacy Statement. If you have any questions regarding data processing, please contact sally.robinson@neurokids.co.uk