

Last updated: May 24<sup>th</sup>, 2020

## **Data Held:**

### **Session Data -**

- Paper notes of sessions, plus consent forms. All locked away in filing cabinet. Only brought out for sessions.
- Audio files of sessions. These are held on a computer for up to a week. The computer is password protected. Archived sessions are held on CDs and stored in filing cabinet.
- Session audios are uploaded to Dropbox. They are there for you to download them for a maximum of three weeks. Before being deleted from Dropbox.
  - Your files are uploaded with 128-bit SSL/TLS encryption.
  - Your files are stored on the Dropbox servers with strong encryption.
  - Your files are downloaded from their servers to your computer using 128-bit SSL/TLS encryption.
  - More info here: <https://dropbox.com/security>
- Each week I back up sessions onto pCloud. This is a cloud storage where I store long term documents securely (TLS/SSL encryption again). I know clients sometimes ask for sessions years after they are done and so they are stored here.
  - More info here: <https://www.pcloud.com/features/security.html>
- Some audios of sessions are recorded and held on mobile ie if an emergency session is done and I am not at home, or if recording a face-to-face session. These will periodically be uploaded to my computer and deleted from mobile.
- Audio sessions are recorded in a room with no other people overhearing.

## **Emails –**

- Emails from clients (and potential clients) are held on computer with password protection. Emails are held for 3 years minimum relating to any conversations which hold information needed for sessions/history of cases as deemed necessary.
- My email provider also holds my emails on my hosting company server too. Details & info here:  
<https://www.greengeeks.com/about/data-center.php>
- Email security is important to me & passwords are a minimum of 13 characters.

## **Class Registrations –**

- Student registration forms, feedback forms, photo release forms & consent forms are held in secure filing system. Records are stored in class date order. Compliant with ICO recommendations. Paper forms may be scanned and saved on computer. Some registration forms are held in emails – if emailed by student.
- Student information may be held in Dropbox whilst a class is on for easy access while traveling or away from home. These files will be deleted on return
- Students have the right to choose if:
  - their image is shared on social media etc
  - if their email/town/name & phone number are shared with fellow students

## **Client Data –**

- Client mobile phone numbers, email & other contact details shared are held on mobile phone. And therefore, are backed up onto iCloud contacts. This is password protected.

- Paper diary of session dates is only source of information not locked away as it is always in use. But Eloise's diary is always with her, not visible to others. And locked away if not in use. Diary will only hold clients full name & possibly phone number if necessary.
- Children's data is held in same manner as adults – but with the consent given to hold the data by the parent, via the consent form.
- Consent forms are held within client's files in locked cabinet.
- Once paperwork is no longer needed it will be shredded and disposed of.
- Paperwork will be held as long as needed for insurance purposes, or for the lifetime of a client.

### **Online Newsletter & Sign Up Forms –**

- Online registrations (for courses, membership area access, newsletter...) are held in ConstantContact. This is password protected & securely held by constant contact. Most people (\*see below) on Eloise's "mailing lists" have completed double opt-in process online or have signed offline that they are happy to receive emails& marketing from me. (\* There are some verbal, or emailed – and lost in time - agreement names in there from 12+ years ago. It is expected people will have left if they no longer want to hear from me.)
- Some old data is held on MailChimp for certain programmes. This is also password protected and held securely by them.
- All students & clients have signed to say they are happy to be added to my mailing list.

### **Online Courses & Group Sessions –**

- If students sign up for online courses or group sessions, they will have a profile added to the platform of the course. Wherever the course or sessions are delivered from.
- Depending on the class/session the platforms will be ClickFunnels or Teachable.

- For info on ClickFunnels GDPR policy please go here – <https://signup.clickfunnels.com/privacy-policy>
- For Teachable here – <https://support.teachable.com/hc/en-us/articles/360000954272-EU-GDPR-and-Teachable>
- Students are able to delete their profile on these sites at any time. Obviously, that means they will no longer have access to the content.
- If students participate in group sessions, no individual names or information is shared in the group.

### **MindScape Online –**

- Due to lockdown I am currently teaching MindScape online. There are explicit waver forms for these classes.
- The classes are recorded by the Zoom platform which is used for the classes. Zoom will house the recordings, they will then be downloaded to Eloise's computer & then onto a pCloud (previously mentioned) for sharing & storage.
- The audio of the classes will be available to students who sign the audio waver to say this is just for their own use. This will be stored for 2 weeks with the students. They have the ability to download & keep those parts of the class which are able to record.
- If a student wishes a section of private share with the group to be removed from the group share, they can request this.
- The video of the class will be deleted as soon as I (Eloise) have finished reviewing the class. This will normally be within a few days.
- The audio of the class (as discussed in the waver) maybe shared with the IBA (International BodyTalk Association) if they wish to review the class.

### **General –**

- Everyone can leave and unsubscribe from my mailing lists whenever they like.

- Most of my websites capture user interactions via my FaceBook pixel. These have been de-activated until I can work out how to ensure consent.
- Your IP address maybe tracked or Cookies used by third party sites (for example ConstantContact) to enable functions to work such as “share this” buttons inside emails.