



Dyslexia Cardiff Ltd.
Also trading as:
Tom Pearson,
Independent Educational Psychology Services

GDPR Data Privacy Policy

Created by
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This policy has been created following training and consultation with GDPR SME Ltd.:
www.gdprsmc.co.uk

Introduction

Dyslexia Cardiff Ltd. aims to be as clear as possible about how and why we use information about you, the client, so that you can be confident that your privacy is protected.

This policy describes the information that Dyslexia Cardiff Ltd. collects when you use our services. This information includes personal information as defined in the General Data Protection Regulation (GDPR) 2016 [and the subsequent UK Data Protection Bill that is expected to be enacted in May 2018].

This policy describes how we manage your information when you use our services, if you contact us or when we contact you. It also provides extra details to accompany specific statements about privacy that you may see when you use our website (such as cookies) or with other online presence (such as Facebook). In respect of cookies the policy includes information about the type of cookies that our website host uses and how you may disable those cookies.

Dyslexia Cardiff Ltd. uses the information we collect in accordance with all laws concerning the protection of personal data, including the Data Protection Act 1998 and the GDPR 2016. As per these laws, Tom Pearson, Director of Dyslexia Cardiff Ltd is the data controller; if another party has access to your data we will tell you if they are acting as a data controller or a data processor, who they are, what they are doing with your data and why we need to provide them with the information.

If your questions are not fully answered by this policy, please contact our Data Protection Officer, the Director. If you are not satisfied with the answers from the Data Protection Officer, you can contact the Information Commissioner's Office (ICO) <https://ico.org.uk>.

Background to the business

Dyslexia Cardiff Ltd. was formed in April 2015 and is a very small company owned and operated by Mr Tom Pearson, who is the sole Director of the company. Tom Pearson qualified as an Educational Psychologist in 2003 who is registered as a practitioner psychologist with the Health and Care Professions Council (HCPC), the UK's regulatory body for qualified psychologists. He is also recognised as a Chartered Psychologist and Associate Fellow with the British Psychological Society (BPS).

There are no other employees and the business is run from the home office of the company director. The official business address, registered with Companies House, is the address of our accountants' firm: Roblins Chartered Accountants, Unit 3/Deryn Court/Wharfedale Rd, Cardiff CF23 7HA.

The company operates under the trading name of Dyslexia Cardiff Ltd. and also as Tom Pearson, Educational Psychology Services. The company provides psychological assessment and consultation services, which relate not only to dyslexia but to a wide variety of learning and behavioural needs. Our clients include:

- Schools.
- Universities and FE settings.
- Post 16 training providers.
- Adults commissioning private psychological assessment/ consultation.
- Adults commissioning private psychological assessment/ consultation for their children/ children in their care.
- Local authorities.

1. Why do we need to collect your personal data?

We need to collect information about you so that we can:

- Know who you are so that we can communicate with you in a personal way. The legal basis for this is a legitimate interest in providing services to you, your child, or a child in your care, as requested by you.
- Deliver psychological and educational services to you, your child, or a child in your care, as requested by you. The legal basis for this is the contract or agreed arrangement with you.
- Send you an invoice to seek payment for our services. The legal basis for this is the contract or agreed arrangement with you.
- Contact you in case there is a problem. The legal basis for this is a legitimate interest.
- Provide you with a useful and relevant website. The legal basis for this is legitimate interest.

2. What personal information do we collect and when do we collect it?

For us to provide you with services, we need to collect the following information:

- Your name.
- Where relevant, the name, address and date of birth or your child or child in your care.
- Your contact details including a postal address, telephone number(s) and electronic contact such as email address. We may also communicate via Facebook, if you chose to communicate with either of our two Facebook pages.
- Details about how you access our website such as the IP address, the browser you use, and which pages you access.

We collect this information directly from you or, in the case of our work with schools, we may be provided with this information by the school, who will have obtained parental permission to share this information with us.

On our two websites, we use cookies to gather information about visitors which we use only to enhance your online experience and evaluate the interest in the website. We do not identify you or any other individuals from this information (see Appendix 1 below for more information on how cookies are used). Similarly, the IP address of any user visiting the website is logged; again, this is not used to develop a personal profile of you, it is used to ensure our website is providing useful and relevant information to anyone who uses it.

Please note that we do not store our payment card details in any of our systems as payments are (apart from a few cash and cheque payments) sent by clients through bank transfer following invoicing. We do not require any card details, therefore.

3. How do we use the information that we collect?

We use the data we collect from you in the following ways:

- To communicate with you so that we can inform you about your appointments with us we may use your name, your child's name (where relevant) your contact details such as your telephone number, email address or postal address.
- To deliver the correct service, which may include visiting you at home (if you request this), we use your name, your child's name and date of birth (where relevant) and your contact details such as your telephone number, email address or postal address.
- To create your invoice using our accounting package we use your name and postal address. *Your child's name or date of birth (if relevant) is not included in our invoicing.*

4. Where do we keep the information and what is stored there?

We keep your information on:

1. The four Apple devices listed below.
2. Via devices 1, 2 and 3 devices, a secure iCloud account, provided by Apple, Inc.

4.1. On our company computers

Device	Number of devices in use	Form of protection
1. iMac	1	Password access and hard-drive encryption via FileVault
2. MacBook Pro	1	Password and hard-drive encryption via FileVault
3. iPhone 8	1	PIN or fingerprint ID
4. iPad mini	1	PIN

Passwords are changed every 90 days.

Note: the iPad mini holds minimal information and relates only to point 4.3.

Referral/ consent forms

We obtain referral/ consent forms which provide us with basic details and signed parental permission to work with a child. These give details of name, date of birth, postal address, email address and phone number and are stored in electronic form on iCloud, with back-up copies stored on the hard-drives of the company iMac and MacBook Pro.

These can be accessed by the Director via computer devices 1, 2 and 3 listed above.

Written reports

Following our assessment or consultation work we create a typed report, which will usually provide a summary of matters discussed, assessment outcomes, conclusions and recommendations. This report will also contain personal information about you or your child including name, address and date of birth.

This report will be stored on iCloud, with back-up copies stored on the hard-drives of the company iMac and MacBook Pro.

Written psychological reports and referral forms are accessible to the Director on the three password protected computers listed, via iCloud. The purpose of this is so that the Director, can access these reports in different locations, for the legitimate benefit of the client and to facilitate efficient working practice.

Apple is compliant with GDPR (see <https://www.apple.com/legal/privacy/en-ww/governance/>) . iCloud's servers are located in Denmark within the EU, and information is encrypted in transit and at rest (source: GDPR SME).

2-factor authentication is set up for our iCloud access.

Reports can be accessed only by the Director via computer devices 1, 2 and 3 listed above.

Appointments

Details of appointments with you are held in electronic calendar form. This is accessible to the Director on the computer devices 1, 2 and 3 listed above and via passworded Google Drive access. Data with Google is sent and stored in encrypted form on their server in Ireland. Google is GDPR compliant.

4.2. In our accounts software

We use an online accounts package called Kashflow, provided by Kashflow Software Ltd, which we pay for through monthly subscription. It is accessed via computer devices 1, 2 and 3 listed above.

The personal information included on your invoice and stored by Kashflow is only your name and postal address, as required by the HMRC.

On their website Kashflow state that the data is stored on a Microsoft SQL Server based at Rackspace Data Centre in London. Information about this data centre can be found here: <https://www.rackspace.com/about/datacenters>. Kashflow Software Ltd. states that they are compliant with GDPR.

Our accountants at Roblins Chartered Accountants Ltd. will have access to our invoices when they are requested to provide our annual company tax return, as required by the HMRC under UK law. Our accountants are compliant with GDPR.

Please note: the names and dates of birth of children are not used in our invoicing.

4.3. In our assessment software

We use an assessment package called Q-Interactive, provided by Pearson Clinical UK when working with adults and children, for the purpose of assessing their cognitive skills and educational attainments. It is accessed via computer devices 1, 2 and 4 listed above and uses 2-factor authentication.

The data stored securely with Pearson Clinical, who are GDPR compliant, includes only the client's name and date of birth.

This is stored briefly on the iPad mini, and for a longer period on Pearson Clinical's encrypted server, using a secure connection, at Pearson's dedicated hosting facility in Toronto, Canada. (Source: <https://www.helloq.co.uk/support/frequently-asked-questions.html>).

Please note, the fact that Pearson Clinical UK shares the same name as Tom Pearson, Director, is simply a coincidence.

4.4. As a paper copy

Handwritten notes may be taken when we meet. These notes are used to create the report that we provide to you. These notes tend not to be extensive and tend to record details of the conversation with clients rather than personal information in terms of identification. They are almost never required after the report is compiled.

These notes are kept in a client's paper file in a locked filing cabinet at the Director's home office. The paper file contains just a first name on the cover (no surname, date of birth, nor address).

5. Who do we send the information to?

- We will send the written report to you and, on extremely rare occasions, anyone we are required by law to inform. All reports that are sent electronically are sent as attachments that are encrypted and password protected:
 - In the case of schools and organisations: you will be provided in person with a PIN which you will use to open the locked zip file which has been emailed to you.
 - In the case of individual clients, you will have a password texted to you via WhatsApp, which will allow you to open the passworded pdf file which has been emailed to you.
 - From 25th May, we will be moving towards the use of the Egress Switch, a secure email encryption and data sharing service, for which we pay a yearly subscription. Egress uses a data centre in the UK to store encrypted emails. <https://supportcentre.egress.com/hc/en-gb/articles/203173931-Where-is-my-encrypted-data-held->)
- Our accountant has access to invoices only. The accountant is based in the UK and is GDPR compliant.
- Wix.com send the details about your access to our website to our web analytics provider. They are based in European Union and are GDPR compliant.
- As part of our service to parents, we may need to send details of appointments. To protect your information, we prefer to use an end-to-end encrypted messaging service. If you are not able to use such a service we may use SMS (text messages); however, this does increase the risk of someone intercepting the message.
- We may also make arrangements with you using email, which is provided from our end by Gmail. Email is not considered to be as safe as other end-to-end encrypted forms of electronic communication, so it is important to avoid sharing personal information in this way. Whilst this is outside of our own GDPR remit, we expect that organisations we work

with are GDPR compliant and hence would need then to password any documents sent to us via email.

6. How long do we keep the information?

GDPR makes it clear that we should not keep personal information for any longer than is useful and meaningful.

The company's view is that it is in the client's best interest, in terms of GDPR legislation, for information to be permanently destroyed after these periods of time stated below. The company holds the view that data should not be kept for many years simply for the very remote chance of being requested for this information many years into the future. For such data to be kept for up to 25 years may well be valid for much larger educational and health organisations – however, it is not felt to be appropriate on the basis of the work undertaken by Dyslexia Cardiff Ltd. (which is not primarily to inform legal institutions). Requests for information any older than around 2 years old are extremely rare, in our experience.

Therefore:

- We keep handwritten notes in paper files for **six months** before shredding.
- We keep referral forms electronically for **four years** before deleting.
- We keep written reports electronically for **four years** before deleting. This time period has been decided upon on the basis that requests for old reports tend to be more recent than this. To keep reports for many more years than this, simply to anticipate very rare requests for old reports, contravenes GDPR guidance.
- Email communication with you will be deleted **after four years**.
- We keep the electronic invoices with Kashflow for **seven years** before deleting. This time period has been decided as it is the required length to comply with the HMRC tax legislation requirements.
- We keep the details of past appointments on our electronic calendar for **three years**, before deleting.

7. How can I see all the information you have about me?

You can simply contact the Director or make a subject access request (SAR) by contacting the Data Protection Officer. We may require additional verification that you are who you say you are to process this request. We may withhold such personal information to the extent permitted by law. In practice, this means that we may not provide information if we consider that providing the information will violate your vital interests.

8. What if my information is incorrect or I wish to be removed from your system?

Please contact the Director. If you wish to have your information corrected, you must provide us with the correct data and after we have corrected the data in our systems we will send you a copy of the updated information in the same format at the subject access request in section 7.

9. How can I have my information removed?

If you want to have your data removed we have to determine if we need to keep the data, for example in case HMRC wish to inspect our records. If we decide that we should delete the data, we will do so without undue delay.

10. Will we send emails and text messages to you?

As part of providing our service to you we will send your report to you via email. The report will be encrypted, and password protected, as described in Section 6 of this policy document.

We may also send you text messages for the purpose of arranging meetings or assessments, for example.

We may aim to communicate via WhatsApp, particularly when obtaining personal details such as name, date of birth and address, as WhatsApp provides end-to-end encryption.

11. How do I opt out of receiving emails and/or text messages from us?

Dyslexia Cardiff Ltd. does not hold emails or mobile numbers for the purpose of any ongoing/subscribed communication. You will not receive information such as advertisements or special offers, for example.

12. Work with other psychologists

On some occasions, the Director will pass a request for psychological services on to Bronwen Parry, Educational Psychologist. This is an informal arrangement with Mrs Parry who has no access to any of the information held by Dyslexia Cardiff Ltd.

When client information is passed to her this is in the form of a WhatsApp message giving the client's name, telephone number and email address. Passing on this information would always be agreed with the client before sending.

Policy written by Tom Pearson, Director, Dyslexia Cardiff Ltd.

Date of initial publication: 5th May 2018

Last updated: 7th May 2018

This GDPR policy may be subject to change, for the purpose of further updates in pursuit of securing your data. Please check at www.educationalpsychologistcardiff.co.uk or www.dyslexiacardiff.com for the most current version of this document.

Appendix 1: Cookies

1. What is a cookie?

A cookie is a small amount of data stored on a computer that contains information about the internet pages that have been viewed from that computer. They are commonplace on the internet and are used by websites to improve the user's online experience by storing information about how the user navigated around and interacted with it. This information is then read by the website on the next occasion that the user visits.

Cookies are sent automatically by websites as they are viewed, but in order to protect a user's privacy, a computer will only permit a website to access the cookies it has sent, and not the cookies sent by other sites. Furthermore, users can adjust the settings on their computer to restrict the number of cookies that it accepts, or notify them each time a cookie is sent. This should improve privacy and security but will generally mean that certain personalised services cannot be provided, and it may therefore prevent the user from taking full advantage of a website's features.

For further information on cookies, please visit www.aboutcookies.org.

2. What sort of cookies do we use on our websites?

Dyslexia Cardiff Ltd has two websites:

www.dyslexiacardiff.com and www.educationalpsychologistcardiff.com

Both of these are managed by Tom Pearson, Director, Dyslexia Cardiff Ltd.

The websites are both hosted by www.wix.com who use two types of cookies: session cookies and stored cookies.

Session cookies expire at the end of the user's browser session and can also expire after the session has been inactive for a specified length of time, usually 20 minutes. Session cookies are stored in the computer's memory and are automatically deleted from the user's computer when the browser is closed.

Stored cookies are stored on the user's computer and are not deleted when the browser is closed. Stored cookies can retain user preferences for a particular website, allowing those preferences to be used in future browsing sessions.

Wix.com provide further information about cookies here: <https://support.wix.com/en/article/site-compliance-with-the-european-union-cookie-law>

3. How does Wix.com use cookies?

They use a number of independent measurement and research companies. They may gather information regarding the visitors to our website on our behalf using cookies, log file data and code which is embedded on our website. They may use this type of information to help improve the services it provides to their users. We explicitly require that third parties do not use any information for their own business or other purposes.

4. Can I browse your website without receiving any cookies?

Yes. If you have set your computer to reject cookies, you can still browse our website. However, certain functions may not be available to you unless you enable cookies.

5. How can I find and control cookies?

You can usually adjust for yourself the number of cookies that your computer (or other device, such as a mobile phone) receives. How this is done, however, varies according to which device and what browser software you are using. As a general rule, the more commonly used web browser software packages tend to have a drop-down menu entitled 'Tools'. One of the options on this menu is usually 'Options' – and if this is selected, 'Privacy' is usually one of the settings that may be adjusted by the user. In the case of any device other than a PC (e.g. mobile phone), you should always refer to the manufacturer's instructions.

Alternatively, you may wish to opt-out from only the cookies used by third-party companies (acting on our behalf) to measure the traffic to our site. This has the advantage of leaving other cookies in place, thereby minimising the loss of functionality associated with blocking all cookies.

You may find the following websites useful for information on how to change cookie settings in a range of commonly used browsers: www.aboutcookies.org

Please note cookies are only for the purpose of enhancing your online experience and no personal data is collected from you through this process.