



Carla Rodrigues

RM, Lactation Consultant IBCLC

Tongue Tie Practitioner

Privacy & Confidentiality Policy

1. Introduction

This privacy notice provides you with details of how I collect and process your personal data.

Latch World is owned and run by Carla Rodrigues RM, IBCLC and Tongue-Tie practitioner who is the data controller registered with the Information Commissioners Office. As a registered midwife Carla Rodrigues is required by the Nursing and Midwifery Council's Code of Conduct to respect people's right to privacy and confidentiality so protecting your privacy is fundamental to her practice. This notice explains what information I collect from you, why I collect this information, under what circumstance this information may be shared, how long it is stored and how you can access it.

My email address is **Carla@latchworld.co.uk**.

My postal address is **12 Hawthorn Park, Dunfermline, Fife, KY12 ODY**.

Phone number is **07426877425**

Sensitive Data

During our contacts by phone, text, messenger, email, via the contact page on our website, via social media and face to face I will collect and record personal information about you and your baby. This information will include medical information relevant to the issue you are seeing me about. I may use your contact information to contact you at a later date for the purposes of follow up, audit and research.

Whilst I take steps to ensure your information is secure communications by text, email, messenger, social media and my website may not be secure so keep this in mind when using these methods.

I am required by the Nursing and Midwifery Council's Code of Conduct to keep clear and accurate records relevant to my practice. This is to enable me to contact you and to provide safe and effective care for you and your baby. These records, which will contain your personal/medical information and that of your child, include summaries of our consultations and copies of emails. They are stored on electronic devices which are password protected and have security software installed. Long term storage is on encrypted memory sticks kept securely and paper documents are kept in a locked cabinet.

I require your explicit consent for processing sensitive data (medical information) and I will request you to complete a signed consent for this.

2. How I use your personal data

I will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where I need to perform the contract between us.
- Necessary for our legitimate interests.
- Where I need to comply with a legal or regulatory obligation.

Purposes for processing your personal data

Set out below is a description of the ways I intend to use your personal data and the legal grounds on which I will process such data. I have also explained what legitimate interests are where relevant.

I may process your personal data for more than one lawful ground, depending on the specific purpose for which I am using your data. Please email me at carla@latchworld.co.uk if you need details about the specific legal ground I am relying on to process your personal data where more than one ground has been set out in the table below.

<i>Purpose/Activity</i>	<i>Type of data</i>	<i>Lawful basis for processing</i>
To register you as a new client	Identity Contact	Performance of a contract with you eg: provision of a consultation and follow up support
To process your payment for services: <ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to me 	Identity Contact Financial Transaction	Performance of a contract with you Necessary for my legitimate interests to receive payments owed to me
To manage the relationship with you which may include: <ul style="list-style-type: none"> • Providing consultations and follow up support • Asking you to leave a review or take a survey • Notifying you about changes to the terms or privacy policy • Managing complaints about the service 	Identity Contact Medical Data Photographs/Images	Performance of a contract with you Necessary to comply with a legal and regulatory obligation (NMC Code of Conduct) Necessary for legitimate interests including keep records updated, studying how clients use services, improving services
For the purposes of anonymised audit/research	Contact Medical Data	Necessary for legitimate interests to study how clients use services, to evaluate and to develop them and to assess

3. Disclosures of your personal data

I will not share your personal/medical data with any third parties except in the following situations:

- I will write to your GP to inform that your baby has had a tongue-tie division. I will also write in your baby's Red Book so your HV have information about what type of tongue-tie it was, the reason for division and a very brief summary of any care plan put in place. This is to ensure other professionals involved in the care of your baby are informed to promote safe and effective care.
- With your consent I may contact your midwife, GP, HV or other healthcare professionals involved in your care and share relevant information to enhance the care of you and your baby. For example I may write to your GP to request a prescription for a nipple infection or phone your health visitor to discuss extra support.
- Should I have a concern about the safety of your child then I have a legal and professional obligation to share relevant information with the relevant agencies and in this case your consent is not required.
- Anonymised data may be used and shared for the purpose of internal and external audits/research.
- In the event of a complaint or claim relevant information will be shared, with your consent, with my indemnity provider and legal team.
- Photographs may be used to form part of my consultation record, for educational and publicity purposes but only with your consent.
- Transaction and financial data may be shared with my accountant, bank, card payment machine provider and with HMRC in certain circumstances.

I require all third parties I work with to respect the security of your personal data and to treat it in accordance with the law.

We do not transfer your personal data outside the European Economic Area (EEA).

4. Data security

I have put in place what I believe are appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data will be limited to Carla Rodrigues. Access to consultation records and emails which may include medical data will be restricted to me only except in the circumstances listed above in section 3.

In the event of a personal data breach I will notify you and any applicable regulator of the breach where I am legally required to do so.

5. Data retention

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

By law I have to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

By law medical records on children have to be kept for 25 years.

In some circumstances you can ask us to amend your data: see below for further information.

6. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.
- Right to complain about handling of your personal data.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email me at carla@latchworld.co.uk.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

I may need to request specific information from you to help to confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. I may also contact you to ask for further information in relation to your request to speed up our response.

If you are not happy with any aspect of how I collect and use your data, you have the right to complain. You can contact me (details above). I will investigate your concerns and will acknowledge receipt of the complaint within 30 days. I might need to gather more information and contact you for further information.

I am to keep you informed during this process and will provide you with a written outcome once investigation is complete. Where appropriate, I will take steps to correct/improve data handling practices.

All the complaints and process of resolution are free of charge.

If you are not satisfied with my response, you have the right to complain to: Information Commissioner's Office
Website: <https://ico.org.uk> to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).

I will respond to all legitimate requests within 30 days.