



Independent Speech and Language Therapy Services Privacy Notice

ISLTS is committed to protecting and respecting your privacy.

This Privacy Notice together with our Terms of Use and any other documents referred to in it sets out how ISLTS collects, uses, maintains and discloses Personal Data, including any information provided through our website(s) (the “Website”).

Your privacy is of the utmost importance to us. Please read this Privacy Notice carefully to understand our views and practices regarding your personal data and how we will treat it.

Whenever you provide personal information, we are legally obliged to use it in accordance with the laws concerning the protection of personal information.

Who we are

INDEPENDENT SPEECH & LANGUAGE THERAPY SERVICES LTD is a limited company registered in England under company no. 05280034, and with its registered address at 155 Unthank Road, Norwich, Norfolk, NR2 2PG (“**ISLTS**”)

For the purposes of the Data Protection Act 2018, the General Data Protection Regulations and any other applicable data protection and privacy laws and regulations (“**Data Protection Legislation**”), ISLTS will be the ‘data controller’ for all personal information that we determine the means and purpose of processing. We are registered with the Information Commissioners Office under registration number ZA020076.

By “**Personal Data**” we refer to information collected or held by ISLTS, that identifies and relates to you as an individual.

Information we may collect

We may collect personal information about you when you request our services, including:

- your name;
- postal address;
- date of birth;
- invoicing details/address;
- information regarding the services you request;
- information relating to your educational or care institution;
- supplementary information you provide us about yourself when contacting us;
- relevant physical and mental health information;
- lifestyle, employment and educational information relevant to providing our services;
- email address; and
- telephone numbers (including mobile).

We may also collect technical information about you when you visit the Website. This information may include the Internet protocol (IP) address used to connect your computer to the Internet, your browser type and version, time zone setting, operating system and platform, browser plug-in types and version, the full URL clickstream to, through and from the Website, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

The collected information is used to provide an overview of how people are accessing and using the Website. It is not used for any additional purpose, such as to profile those who access the Website.

What do we do with the information we collect?

We will use your personal information for a number of purposes including:

- internal record keeping;
- creation of detailed clinical records regarding the services we provide;
- to carry out any obligations owed to you in respect of any contracts entered into between you and us;
- to give you information that you request from us and to improve our services;
- to notify you about changes to our services;
- to undertake sales analysis and management of the business;
- to allow us to operate the Website efficiently;
- to ensure that the content from our Website is presented in the most effective manner for you and your computer;
- any relevant troubleshooting, testing or statistical analysis as appropriate; and
- to keep the Website secure.

Data retention

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

To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Legal basis of processing

We will only process your information for as long as we have a relevant legal basis to do so. This may be to provide you with the contractual services you have requested from ISLTS or if you have provided us with adequate consent to process your information for other purposes.

If we choose to process your information under the legal basis of legitimate interests, we will always inform you of our legitimate business interest and your right to object.

If we have collected sensitive personal data as part of our service provision, we will always ensure that we either request explicit consent from you or document the appropriate exemption to allow the processing of this data.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at office@islts.co.uk.

Protecting your information

We are committed to ensuring that your information is secure and we have procedures in place to try and prevent any unauthorised access or disclosures and to safeguard and keep secure the information that we collect online.

All the Personal Data collected by us and stored electronically is held on a secure server in the EEA only. Where required, this information is encrypted for additional security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to Personal Data only for those employees who require it to fulfil their job responsibilities.

However, you should be aware that providing information over the internet can never be guaranteed as being completely safe and if you choose to send such information to us via the internet, you do so at your own risk.

Data protection officer

To ensure we continue to monitor our obligations under Data Protection Legislation, ISLTS has appointed a data protection officer (DPO). If you wish to contact the DPO regarding any specific elements of ISLTS's data handling, please send your enquiries for attention of the DPO to office@islts.co.uk.

Transfer of data outside of the EU

We shall not transfer any personal data to any country outside of the European Economic Area unless we ensure that such personal data is subject to an adequate level of protection and appropriate legal safeguards in accordance with Data Protection Legislation.

Sharing your information with others

Please be assured that we will not share your information for any other reason unless we are required by law or permitted to do so under this Privacy Notice. The main circumstances in which we will be permitted or required to disclose this is by law will be by court order, to government bodies and law enforcement agencies.

In the normal course of our services we also share personal information with the lead organisation who may have referred you to our services or with ancillary health care services involved in the provision of your treatment. We may also share information regarding your treatment with your educational institution or your child's nursery.

Sometimes we may share your information with third parties in the following ways:

- we may use carefully selected sub-processors to help us collect, store or manage your information. This will always be managed under the terms of a written data processing agreement;
- analytics and search engine providers that assist us in the improvement and optimisation of the Website; and
- if ISLTS is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets. We process your personal information for this purpose because we have a legitimate interest to ensure our business can be continued by the buyer. If you object to our use of your personal information in this way, the relevant seller or buyer of our business may not be able to provide services to you.

Access to your Personal Data

You have rights in relation to any Personal Data that we hold about you. If you wish to access your Personal Data you may make a formal subject access request by contacting ISLTS.

The information you request must relate to you or another person that you have authority to act on their behalf. ISLTS will require a confirmation of your ID prior to providing any information about the data we hold. If you are unable to provide sufficient information to prove your ID, ISLTS reserves the right to refuse your request for access to Personal Data. The rights you have in relation to the Personal Data we hold regarding you are:

- the right to rectify any inaccuracies in the information we hold;
- the right to erasure of information in specific circumstances;
- the right to request transfer of your information to another controller; and
- the right to object to processing in certain circumstances.

If you have provided us with consent to process your information, you always reserve the right to withdraw this consent via the method detailed in the paragraph below. We are committed to ensuring that your wishes are respected and upon notification that you wish to withdraw your consent, ISLTS will immediately cease processing the information in question.

Please send your request to ISLTS by emailing office@islts.co.uk. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to this Privacy Notice

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Data.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

Cookies

This Website uses cookies to help us recognise different users of the Website and to provide users of the Website with a good experience when using it. Please see our **Cookies Policy** for further information.

How can you make a complaint?

Please note that if you are not satisfied with the processing of your personal data as set out in this Privacy Notice, please contact us at office@islts.co.uk.

You have the right to issue a complaint directly with the Information Commissioners Office, the data protection supervisory authority for England and Wales (<https://ico.org.uk/concerns/>).

Contacting us

Please contact us at office@islts.co.uk if you have any questions, comments or requests regarding this Privacy Notice.

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