

## Appropriate Policy Document

---

The Data Protection Act 2018 (DPA 2018) outlines the requirement for an Appropriate Policy Document (APD) to be in place when processing particular category (SC) and criminal offence (CO) data under certain specified conditions.

Almost all the substantial public interest conditions in Schedule 1 Part 2 of the DPA 2018, plus the condition for processing employment, social security and social protection data, require us to have an APD in place.

This document demonstrates that processing SC and CO data based on these specific Schedule 1 conditions complies with the requirements of the General Data Protection Regulation (GDPR) Article 5 principles. It is outlined in our retention policies concerning this data.

Our general record of processing activities under GDPR Article 30 includes:

- (a) The condition that is relied upon is the contractual obligation to deliver the paid services.
- (b) how the processing satisfies Article 6 of the GDPR (lawfulness of processing); and
- (c) The personal data is retained and erased in accordance with, with the retention policies outlined in this APD.

The APD, therefore, complements our general record of processing under Article 30 of the GDPR and provides SC and CO data with further protection and accountability. As per Schedule 1, Part 4, paragraph 41.

We will keep the APD under review and need to retain it until six months after we stop the relevant processing. If the Commissioner asks to see it, we will provide it free of charge. As per Schedule 1 Part 4, paragraph 40.

## Description of data processed

- I. We collect the following data,
  - ii. Client Name
  - iii. Contact Number
  - iv. Email Address
  - v. What type of therapy (CBT, EMDR, Counselling)
  - vi. What delivery method (face-to-face, virtual, telephone)
  - vii. How many sessions are needed?
  - viii. 3<sup>rd</sup> party therapist

## Schedule 1 condition for processing

Please see the link below to our privacy policy.

<https://pinnaclewellbeing.co.uk/wp-content/uploads/2024/06/Privacy-Policy.docx.pdf>

## Procedures for ensuring compliance with the principles

### Accountability principle

- i. We maintain appropriate documentation of our processing activities.
- ii. We have appropriate data protection policies.
- iii. We carry out data protection impact assessments (DPIA) for personal data that are likely to result in a high risk to individuals' interests.

### Principle (a): lawfulness, fairness and transparency

- i. We identified an appropriate lawful basis for processing and a further Schedule 1 condition for processing SC/CO data.
- ii. We provide appropriate privacy information concerning the SC/CO data.
- iii. We are open and honest when we collect the SC/CO data and ensure that we do not deceive or mislead people about its use.

### Principle (b): purpose limitation

- i. We identified our purpose(s) for processing the SC/CO data.
- ii. We included appropriate details of these purposes in our individual privacy information.
- iii. If we use personal data for a new purpose (other than a legal obligation or function set out in law), we check that this is compatible with our original purpose or get specific consent for the new purpose.

### Principle (c): data minimisation

- i. We are satisfied that we only collect the SC/CO personal data we need for our specified purposes.
- ii. We are satisfied that we have sufficient SC/CO data to fulfil those purposes properly.
- iii. We periodically review this SC/CO data and delete anything we don't need.

### Principle (d): Accuracy

- i. We have appropriate processes to check the accuracy of the SC/CO data we collect

and record the source of that data.

- ii. We have a process in place to identify when we need to keep the SC/CO data updated to fulfil our purpose correctly, and we update it as necessary.
- iii. We have a policy and set of procedures that outline how we keep records of mistakes and opinions, deal with challenges to data accuracy, and ensure compliance with the individual's right to rectification.

#### **Principle (e): storage limitation**

- i. We carefully review how long we keep the SC/CO data and justify this amount of time by fulfilling statutory obligations and ensuring consent accuracy.
- ii. We regularly review our information and erase or anonymise this SC/CO data when we no longer need it.
- iii. We identified any SC/CO data we need to keep for public interest archiving, scientific or historical research, or statistical purposes.

#### **Principle (f): integrity and confidentiality (security)**

- i. We analyse the risks presented by our processing and use this to assess the appropriate level of security we need for this data.
- ii. We have an information security policy (or equivalent) regarding this SC/CO data, and we take steps to ensure the policy is implemented and regularly reviewed.
- iii. We have implemented other technical measures or controls because of the circumstances and the type of SC/CO data we are processing.

## **Retention and erasure policies**

Please see the link below for our retention period.

## **APD review date**

Written on 22nd July 2024, and review date is 22 January 2025