

Synapse Psychology



3F1 Third floor 3 Hill Street Edinburgh EH2 3JP

Privacy Notice

How we collect, use, and protect your personal information

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1. Who We Are

Synapse Psychology ("we", "us", "our") is a remote clinical psychology service providing ADHD assessment, mental health assessment, and psychological treatment to clients across the United Kingdom, based in Edinburgh, Scotland.

We are the Data Controller for the personal data described in this notice. This means we decide what personal data we collect and why, and we are responsible for keeping it safe.

- **Data Controller:** Dr Jordan Anthony Bibby, practicing as 'Synapse Psychology'
- **Registered/business address:** 3F1 Third floor 3 Hill Street Edinburgh EH2 3JP
- **Data Protection contact:** Dr Jordan Anthony Bibby, Hello@synapsepsychology.co.uk
- **ICO registration (data protection fee) reference:** [ICO REGISTRATION NUMBER]

This notice applies to clients, prospective clients, parents/guardians or other people consenting on a client's behalf, GPs and referrers, and anyone else whose personal data we process in connection with the Service (for example, an informant who completes a questionnaire about someone else).

This notice should be read alongside our Terms and Conditions, which govern the contractual relationship with clients. Where the two documents overlap, this notice is the fuller and more current statement of our data protection practices.

2. What Personal Data We Collect

We may collect and process the following types of personal data:

- **Identity and contact details:** name, date of birth, address, email address, and telephone number.
- **GP practice details and NHS number,** where provided and consented to.
- **Health and clinical information:** presenting concerns, developmental and medical history, assessment responses, questionnaire and rating scale scores, diagnostic formulations, and treatment notes.
- **Information from third parties** provided with your consent, for example, a parent, partner, teacher, or employer completing an informant questionnaire.
- **Correspondence with us,** including emails and any messages sent through our booking system and business email address.
- **Billing and payment information.**
- **Basic technical information** needed to run a remote video appointment, for example, the email address to which a video link is sent.

We collect this information directly from you, for example via referral forms, intake questionnaires, and during sessions, and sometimes from others involved in your care or assessment, with your consent.

3. Why We Use Your Data, and Our Lawful Basis

We use your personal data to assess your needs, provide treatment, produce reports, manage appointments and billing, and meet our professional and legal obligations.

3.1 Ordinary Personal Data

We process ordinary personal data under UK GDPR Article 6(1)(b), where processing is necessary to perform our contract with you, for example booking and delivering appointments, and Article 6(1)(f), where processing is necessary for our legitimate interests in running the Service, such as basic administration and record-keeping.

3.2 Health Data (Special Category Data)

Your health information is "special category data" under Article 9 of the UK GDPR. We process it under Article 9(2)(h), concerning the provision of health care, together with the condition in Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018.

This condition applies because the processing is carried out by, or under the responsibility of, a health professional (your HCPC-registered psychologist) who is subject to a professional duty of confidentiality.

Where we ask for your specific consent for a discretionary disclosure, for example sending a copy of your report to your employer or school, that consent is separate from, and in addition to, the lawful basis above. You can withdraw it at any time, without affecting anything already done.

4. Confidentiality

Information you share with us is confidential.

We may share information without your consent only in limited circumstances — for example, where there is a serious risk to your safety or someone else's, a safeguarding concern about a child or adult at risk, or a legal requirement to disclose.

Full detail on these limits is set out in our Terms and Conditions, Section 6.

5. Who We Share Your Data With

We only share personal data where necessary, and with the following categories of recipient:

- **Your GP or referring clinician**, typically with your consent, to support continuity of care.
- **NHS services or other authorities**, where a safeguarding or risk exception applies.
- **Our clinical supervisor(s)**, in anonymised or pseudonymised form, as required by our professional regulator.
- **Service providers who process data on our behalf ("processors")**, listed in Section 6 below.
- **Our accountant/bookkeeper**, for billing data only.
- **Any other recipient** you have given specific, written consent for us to share with.

We do not sell your personal data, and we do not use it for marketing unless you have separately opted in.

6. The Platforms and Processors We Use

We use a small number of third-party service providers ("processors") to help run the Service. Each is contractually bound, via a Data Processing Agreement, to only process your data on our instructions and to keep it secure.

6.1 WriteUpp — Clinical Practice Management

We use WriteUpp, provided by Pathway Software (UK) Limited, for clinical work including booking, clinical notes, assessment records, reports, and other personally identifiable and health information.

WriteUpp hosts data on servers in the European Union (Dublin, Ireland). As the UK has an adequacy decision covering the EEA, this transfer does not need additional safeguards.

WriteUpp's own terms note that its sub-processors may, in limited circumstances, process data in the United States, the Republic of Ireland, or the Netherlands, under contractual safeguards required by Article 46 of the UK GDPR.

We have entered into WriteUpp's Data Processing Agreement, incorporated into their Terms of Service, governing their processing of Patient Data as our processor.

6.2 Google Workspace, including Google Meet — Email and Intake/Screening Correspondence and Video Appointment Platform

We use Google Workspace, including Google Meet, for professional email correspondence, administrative communications, and remote clinical appointments.

Google Meet is used to conduct video appointments with clients. We do not routinely record clinical appointments, and we do not routinely use transcription or automated meeting-note features during clinical appointments.

Google processes information necessary to provide and secure Google Workspace and Google Meet services. Depending on the service and configuration, this may include account information, meeting information, participant information, technical information, and the content of communications or other data submitted to the service.

We use Google Workspace on a Business Standard subscription. This subscription does not provide the Enterprise data-region controls that allow us to select a specific geographic data region for covered Workspace data. Accordingly, we do not represent that all personal data processed through Google Workspace or Google Meet is stored or processed exclusively in the UK or European Economic Area.

Google may process personal data in countries outside the UK. Where UK personal data is transferred internationally, the transfer is subject to the safeguards provided for under Google's contractual terms and applicable UK data-protection law, including the UK International Data Transfer Addendum and/or other applicable transfer mechanisms.

We minimise the amount of detailed clinical information processed through Google Workspace. Detailed clinical records, assessment information and clinical reports are maintained within our clinical practice management system, WriteUpp, wherever practicable.

We have reviewed and accepted the applicable Google Workspace contractual terms and Cloud Data Processing Addendum for our Workspace account.

Google Meet recording, transcription and automated meeting-note features are disabled for routine clinical appointments unless separately assessed and authorised. If any information is recorded, either via audio or transcription, this will require prior explicit consent by both the service user and clinician. We ask that you do not record any information from clinical appointments, unless consent has been agreed by both parties.

6.4 Third-Party Mail Processing and Virtual Office, 'Virtually There'

Synapse Psychology uses a third-party virtual office and mail-handling service provided by Virtually There Offices Limited ("Virtually There") for business correspondence and to maintain a professional business address while protecting the privacy of the practice owner's residential address.

Where Virtually There receives, handles, scans, stores or otherwise processes personal data contained in correspondence addressed to Synapse Psychology, it acts as a data processor on behalf of Synapse Psychology, to the extent that it processes such information for the purposes of providing its mail-handling and virtual-office services.

Synapse Psychology remains the data controller for personal data relating to its service users and is responsible for determining the purposes and means of processing such personal data.

Virtually There may receive physical correspondence at its virtual-office address and transfer such correspondence to its processing location. Its authorised personnel may handle correspondence for the purposes of receiving, opening, scanning, categorising, securely storing, forwarding and otherwise administering mail in accordance with the services provided to Synapse Psychology.

Synapse Psychology has instructed service users not to send clinical information, medical records, assessment information, therapy notes, or other sensitive or special-category personal data to the virtual-office postal address. Where clinical information or documents need to be provided to Synapse Psychology, service users will be directed to use the secure communication or document-transfer methods provided by the practice.

The virtual-office address is intended primarily for general business and administrative correspondence and is not intended to form part of Synapse Psychology's clinical record-keeping or clinical communication systems.

Synapse Psychology recognises that, despite these instructions, correspondence containing personal data, including special-category data concerning health, may occasionally be sent to the virtual-office address inadvertently. Where this occurs, such information will be handled as personal data processed on behalf of Synapse Psychology, subject to the applicable contractual, confidentiality, security and data-protection obligations between Synapse Psychology and Virtually There.

Virtually There is required to process personal data in accordance with applicable data-protection law and its contractual obligations to Synapse Psychology, including appropriate confidentiality and security requirements. Where Virtually There uses sub-processors or other third parties to process personal data on behalf of Synapse Psychology, such processing must be subject to appropriate data-protection safeguards as required by applicable law.

Where special-category health information is inadvertently received through the virtual-office service, Synapse Psychology will take appropriate steps to minimise the amount of such information processed through that service and, where appropriate, will arrange for it to be transferred into the practice's secure clinical systems or otherwise dealt with securely.

Synapse Psychology does not intend for Virtually There or its service providers to use service-user clinical information for their own purposes, including advertising, profiling or unrelated commercial purposes.

Any processing of such information by Virtually There is intended to be limited to what is necessary to provide the contracted mail-handling service or to comply with applicable legal obligations.

Further information about Virtually There, including its processing arrangements, security measures, sub-processors and applicable privacy information, is available through Virtually There. Where required, Synapse Psychology will review the suitability of its mail-processing arrangements and any associated data-protection risks as part of its ongoing data-protection compliance.

Important: Service users should not use the Synapse Psychology virtual-office postal address to send clinical information or confidential health information. If a service user is unsure how to send information securely, they should contact Synapse Psychology before sending it.

6.4 Keeping This List Current

This is the complete list of processors we use as at the date of this notice.

If we start using an additional processor, for example, a new video-calling platform, transcription tool, or accounting software, we will update this notice and, where the change is material, notify current clients.

7. International Data Transfers

Aside from the transfers described in Section 6 — WriteUpp's EU hosting and limited sub-processor transfers, and Google Workspace's global infrastructure — we do not transfer your data outside the UK.

Where a transfer occurs, it is protected by one of the following recognised safeguards:

- the UK's adequacy regulations for EEA transfers;
- the UK International Data Transfer Agreement or Addendum; or
- Standard Contractual Clauses.

8. How Long We Keep Your Data

We keep clinical records for the following periods, based on guidance from the British Psychological Society and the NHS Scotland Records Management Code of Practice for Health and Social Care:

- **Adults:** 8 years from the date of your last contact with the Service.
- **Children and young people:** until their 25th birthday (or 26th birthday, if they were 17 years old when their contact with the Service ended).
- **Records relating to a safeguarding concern, complaint, or incident:** retained for the applicable statutory period, which may be longer.

- **Billing and financial records:** We retain financial and accounting records for the periods required by applicable tax and accounting legislation. Where appropriate, we may retain these records for longer where necessary to meet legal, contractual, insurance or professional requirements, such as those set out by HMRC.

At the end of the applicable period, records are securely and irreversibly destroyed, both in paper form and across all electronic systems and backups, including within WriteUpp and Google Workspace.

For serious incidents, complaints, litigation, safeguarding matters or potential claims, records may need to be retained for longer.

9. How We Keep Your Data Secure

We take appropriate technical and organisational measures to protect your personal data, including:

- Encryption of clinical records at rest and in transit, via WriteUpp's and Google's own security infrastructure.
- Access to clinical records restricted to staff who need it, protected by individual logins and multi-factor authentication.
- A written Information Security Policy and Data Protection Impact Assessment for the Service, reviewed at least annually.
- A written procedure for identifying, containing, and, where required, notifying the ICO of a personal data breach within 72 hours of us becoming aware of it.
- Confidentiality and data protection training for any staff or associates with access to client data.

10. Your Rights

Under UK GDPR, you have the right to:

- Be informed about how your data is used, including through this notice.
- Access a copy of your personal data ("subject access request").
- Have inaccurate data corrected.
- Request erasure of your data, although this right is limited for clinical records, which we are professionally and legally required to retain for the periods in Section 8.
- Restrict or object to certain processing.
- Receive your data in a portable format, where technically feasible.
- Withdraw consent at any time, where consent is the basis for processing.
- Complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your data.

The ICO can be contacted at ico.org.uk or on **0303 123 1113**.

To exercise any of these rights, contact our Data Protection Lead using the details in Section 1.

We will respond within one month, as required by law.

11. Automated Decision-Making

We do not use automated decision-making or profiling that produces legal or similarly significant effects about you.

All clinical decisions, including diagnostic conclusions, are made by a qualified practitioner.

12. Children and Young People

Where we work with a young person, we collect and use their personal data in the same way as for adults, with consent from someone holding parental responsibility, or the young person themselves where they have capacity to consent.

We retain children's records until their 25th (or 26th) birthday, as set out in Section 8.

13. Changes to This Notice

We may update this notice from time to time, for example to reflect a change in the law, our practice, or the processors we use.

The "last reviewed" date at the top of this notice shows when it was last updated.

We will notify current clients of any material change.

14. Contact Us

For any question about this notice or how we handle your data, please contact:

- **Dr Jordan Anthony Bibby, practicing as 'Synapse Psychology'**

- **3F1 Third floor 3 Hill Street Edinburgh EH2 3JP (please only send correspondence to this address which is in relation to business concerns. DO NOT send confidential or sensitive data, including health data to this address.**
 - **hello@synapsepsychology.co.uk**
 - **Data Protection Lead: Dr Jordan Anthony Bibby**
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