



Crystal Health Group

Client Privacy Policy

	Crystal Health Group Client Privacy Policy		
	Version	Approval Date	Review Date
	v01.06.17	June 2017	June 2019

Client Comments

Crystal Health welcomes questions and comments regarding its services. Crystal Health's objective is to provide a service that exceeds customer expectations. We understand that to continue to do this, we must always listen to our customers' needs and comments. This policy will demonstrate how the Company protects the personal information it receives.

Client data

The Company only holds or requests data from those individuals involved in or applying for a testing service to be processed by the Company laboratories. The data held will be sufficient to process, monitor and correctly issue the test result. Dependant on the agreement established, the Company will:

- 1) Issue the test result to the person who requested/paid for the test.
- 2) Retain the test result in a secure environment. For retention periods, please refer to Crystal Health's Archive Policy.

The Company does not record and does not have access to any data/information generated during counselling sessions. Individual counsellor contracts will apply.

The company uses data and results in studies relating to statistical parameters for the testing services it provides. This assists in the accuracy of tests. Please note this data will be used in an anonymous manner to prevent individual client traceability.

Processing Data

When a sample is received at the laboratory it is immediately given a unique barcode (identification) number. The details attached to the sample are entered onto a password only, encrypted database. Each case is given a unique reference number. It is this reference and the individual sample barcode numbers that are referred to during the testing process. The only personnel that have access to your results is the Scientists in the laboratory processing the samples and your Case Managers who will provide you with your results documentation. The following principles will apply when we process your personal data:

- Your data is only processed with your knowledge;
- Only data that we actually need is collected;
- Your data is only seen by those who need it to do their jobs;
- Your data is retained only for as long as it is required;
- Your data is accurate and is only used for the intended purpose;
- Your data is protected from unauthorised or accidental disclosure;
- You will be provided with a copy of data we hold on you, through a Subject Access Request (see below);

All information held at the laboratory is protected under the Data Protection Act. Please refer to or request Crystal Health's Archive Policy for sample retention periods.

Crystal Health is registered under the Data Protection Act 1998 Registration No. (Pending).

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Professional Partner data*

We will only hold data of other professionals if:

- The Company has purchased data from an authorised list seller for marketing purposes.
- You have contacted the Company.
- You are a client (or potential client) of the Company. In the above instances the Company will hold personal data in order to make contact with you and/or undertake business with you. To remove yourself from the database please contact 0800 032 5945.

*Professional Partners are considered to be those able to refer cases/clients to Crystal Health and include but is not exclusive to solicitors and GPs.

Responsibility for your personal data

The Company is responsible for the protection of personal data. We undertake to hold this data securely and will not use it for any purpose without prior consent. Our commitment to information security is demonstrated through our certification to the International Standard ISO 27001:2013 Information Security Management.

Our retention periods

Please refer to or request Crystal Health's Archive Policy for sample and documentation retention periods.

Storage of data

Your data is held in secure/encrypted files, which have restricted access.

Subject access

You can contact us to request a copy of the personal data we hold about you. There may be a fee associated with this request, please refer to or request Crystal Health's Archive Policy. As we must be sure that we are releasing information to the right person, you will be asked to supply information to prove your identity.

On occasion, Crystal Health may also receive a request from authorities to release information about you. This can only be done on receipt of an official data request showing exemption from the data protection act.

Transfer outside the European Economic Area

Data for all testing services is performed in the United Kingdom.

Notification of changes

If we decide to change our privacy policy, we will post those changes on our web site. Changes are recorded using strict version control procedures.

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Version Control

It is the responsibility of each person to ensure they adhere to this policy. It is the responsibility of the Operations Manager to maintain and implement this policy.

Previous Version	Changes	Last Effective Date
NEW	• N/A	N/A

Authorisation

Name Nichola McChrystal Position Director

Signed  Date 12/06/2017

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Compliance

Verification of Achievement of Understanding

I _____ (name of employee),

Has read, understood and will comply with the following Crystal Health policy

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Employee Signature _____ Date _____

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