

PRIVACY POLICY

Bloom Speech Therapy

PART 1 – ABOUT THIS POLICY

We believe it is important that the privacy of our clients is properly safeguarded. This privacy policy describes how we handle your personal data, including medical data.

If you have questions about the privacy regulations, please contact your speech pathologist. You can also send an e-mail to amyhanna.slp@gmail.com or contact the practice by telephone, +31 687 671 191.

PART 2 – HOW YOUR PERSONAL INFORMATION IS HANDLED

Article 1 Definitions

In this privacy policy, the following terms are given the following meaning:

Data	the data relating to an individual
Practice	Bloom Speech Therapy
Client	a client of the practice
Processing	any operation or set of operations performed on data or sets of data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission or otherwise making available, alignment or combination, blocking, erasure or destruction of data (Article 4 paragraph 2 <i>General Data Protection Regulation</i>)

Article 2 Applicability

These privacy regulations apply to all processing of personal data by the practice that relate to client care.

Article 3 Goals

The practice can process the data for the following purposes:

- (i) providing speech therapy assessment and/or care;
- (ii) claiming speech therapy care provided from the client or health insurer;
- (iii) invoicing, billing and account management
- (iv) in consultation with others (e.g. general practitioner, daycare, school, occupational therapists, psychologists); only with the consent of the client and/or the parents
- (v) in reporting to the referrer, parents and others
- (vi) sending you standard reminders, for example for appointments and follow-up care, by text message or email to the number or address which you have provided to us
- (vii) for quality improvement purposes
- (viii) for scientific research; only with the consent of the client and/or the parents

Article 4 **Data processing**

1. In order to provide good care, data on treatment shall be recorded in a file. Your treating speech pathologist has a legal obligation to file. The treatment agreement forms the basis for the processing of the data. Only your treating speech pathologist and others who are directly involved in your care request have access to the data insofar as this is necessary to provide good care. In addition, the data is used to be able to declare the care provided.
2. As a healthcare provider, the practice is legally obliged to ensure systematic monitoring of the quality of the care provided. The data can be used for this purpose. We will not process more data than necessary. Where possible, data is also pseudonymised or anonymised so that it cannot be (directly) traced back to individual persons.
3. If we use your data for scientific research, your consent will be requested in advance, unless this is not possible and the law allows the data to be used without the client's consent. In both cases, we will not process more data than necessary. Where possible, data is also pseudonymised or anonymised so that it cannot be (directly) traced back to individual persons.
4. Health insurers with whom the practice has an agreement check whether declared care has been lawfully provided. They may request access to files in the context of physical checks. The practice is obliged to cooperate with this.
5. Your data will not be shared with third parties, unless there is one of the aforementioned situations or if you have given us written permission for this.

Article 5 **Description of the data**

The following data may be processed:

- name
- gender
- address/contact details
- date of birth
- BSN number
- proof of identification
- marital status

- details of playgroup, childcare, school
- name of health insurer and policy number
- name of GP/other healthcare providers
- details of the parent(s)/legal representative
- developmental, medical, ethnic, language, cultural and social histories (including medications, diagnoses, surgeries, and allergies)
- disabilities and impairments;
- family histories, to the extent they may be relevant to our assessment, diagnosis and/or treatment of clients;
- hobbies, motivations, interests, and activities in which clients and their families participate
- profession
- speech therapy history, assessments and treatment plan
- other research or personal data, if relevant

Article 6 Rights

1. As a client, you have the right to know that data about you is being processed. We inform you about this in a general sense by means of these privacy regulations. We, in particular your treating speech pathologist, will also inform you in specific cases, for example if a letter is sent to the general practitioner about the progress or end of the treatment.
2. As a client, you have the right to inspect your data. You can also request a copy of the file containing your data. We will process a request for inspection or copy as soon as possible. A copy is preferably given 'in your hands', whereby we ask you to identify yourself with a valid proof of identity. This precaution is to prevent your data from ending up with unauthorised persons. The personal handover also offers the opportunity to answer any questions.
3. As a client, you have the right to request rectification if there is an inaccuracy and/or incompleteness in your data. We will correct any inaccuracies and/or incompleteness as soon as possible.
4. If you wish to have data destroyed, you can submit a request to do so. We ask you to make this request in writing and, if possible, to state the reasons for medical data. The treating speech pathologist shall assess within three months of the request whether destruction is to be carried out. If there is a compelling reason not to grant the request, for example if it concerns information that is of significant importance to someone other than the client, it can be decided not to proceed with destruction. If your request is rejected, we will do so with reason.
5. As a client, you can have a statement added to your file. We ask you to hand over this statement to your treating speech pathologist so that it can be added to your file.
6. When exercising rights as described in this Article, the following shall apply to minors and guardians:
 1. In the case of a minor up to the age of 12, the rights are exercised by the legal representative, usually the parents;
 2. In the case of a minor between the ages of 12 and 15, the minor and his or her legal representative shall be exercised;
 3. If it concerns a minor from the age of 16, the minor can exercise the rights themselves;
 4. In the case of a person placed in guardianship, the rights are exercised by the legal representative.

Article 7 Retention period (statutory)

1. The record of treatment information shall be kept for fifteen years after the end of the treatment agreement, unless good care entailment entails a longer retention of the data.
2. For files containing treatment information of minors, the retention period of fifteen years shall start to run from the age of 18.
3. In cases other than those specified in this Article, data shall not be kept for longer than is necessary for the purpose.
4. Exception to the foregoing in this article applies if data has been destroyed at your express written request.

Article 8 Confidentiality

We treat your personal data confidentially. This means that we do not provide data to third parties except for the exceptions mentioned below. We also impose a confidentiality obligation on our employees and external parties who engage the practice for the benefit of our activities, such as software suppliers.

An exception to the confidentiality obligation is only possible if:

1. you have given written permission for this;
2. the provision of the data is necessary for proper care provision and the recipient, for example the general practitioner, is also involved in the demand for care;
3. there are compelling reasons to breach medical confidentiality, for example in the event of a state of emergency in the sense of a conflict of duties or in the event of signs of child abuse and/or domestic violence; or
4. we are obliged to do so on the basis of a legal obligation or in a res judicata court decision.

Article 9 Information security

We take all appropriate technical and organisational measures that are reasonably possible to ensure the security of your data. These include:

- (a) all persons who, on behalf of Bloom Speech Therapy, can collect data, are bound to keep it confidential
- (b) the use of secure and encrypted connections;
- (c) using a virus scanner
- (d) using a secure mail environment
- (e) username and password policy on all our systems
- (f) making backups of personal data in order to be able to restore them in the event of physical or technical incidents
- (g) the paper files are stored in locked file cabinets
- (h) the data for the client satisfaction survey is processed anonymously
- (i) regular evaluation of our privacy measures

Article 10 **Data Protection Officer**

1. The owner of the practice is the Data Protection Officer.
2. The Data Protection Officer has the task of supervising data processing and compliance with the General Data Protection Regulation within the practice, and is the first point of contact in this regard.

Article 11 **Amendments**

The practice can adjust privacy regulations unilaterally, for example if the legislation changes. In that case, we will inform you via our website www.bloomspeechtherapy.nl

Article 12 **Complaints**

Although we do everything necessary to guarantee your privacy, it is possible that you are not satisfied with the way in which your data is processed. If you have a complaint, you can discuss this with your treating speech pathologist. She can be reached at the telephone number or e-mail address you have been given.

You are free at all times to submit your complaint to the Dutch Data Protection Authority.

PART 3 – HOW YOUR PERSONAL INFORMATION IS HANDLED WHEN YOU VISIT OUR WEBSITE

This section of our Privacy Policy explains how we handle your personal information which is collected from our website: www.bloomspeechtherapy.nl

This Privacy Policy applies to your use of our website and the use of any of the facilities on our website.

Article 1 **Collection**

When you use our website, we do not attempt to identify you as an individual user and we will not collect personal information about you unless you specifically provide this to us.

Sometimes, we may collect your personal information if you choose to provide this to us via an online form or by email, for example, if you:

- (a) submit a general enquiry via our contacts page;
- (b) submit a general enquiry via the chat function on our website;
- (c) register to receive eNewsletters; or
- (d) send a written complaint or enquiry to our Privacy Officer

When you use our website, our Internet Service Provider (ISP) may record and log for statistical purposes the following information about your visit:

- (a) your computer address;
- (b) your top level name (for example, .com.,gov., .org, .au etc.);
- (c) the date and time of your visit;
- (d) your general location (city and country);

- (e) the pages and documents you access during your visit; and
- (f) the browser you are using

Our website management agent may use statistical data collected by our ISP to evaluate the effectiveness of our website.

Article 2 Cookies

A "cookie" is a device that allows our server to identify and interact more effectively with your computer. Cookies do not identify individual users, but they do identify your ISP and your browser type.

This website uses temporary cookies. This means that upon closing your browser, the temporary cookie assigned to you will be destroyed and no personal information is maintained which will identify you at a later date.

Personal information such as your email address is not collected unless you provide it to us. We do not disclose domain names or aggregate information to third parties other than agents who assist us with this website and who are under obligations of confidentiality. You may be able to configure your browser to accept or reject all cookies and to notify you when a cookie is used. We suggest that you refer to your browser instructions or help screens to learn more about these functions. However, please note that if you configure your browser so as not to receive any cookies, a certain level of functionality of the (name of the practice) website and other websites may be lost.

Article 3 Links to third party websites

We may create links to third party websites. We are not responsible for the content or privacy practices employed by websites that are linked from our website.

Article 4 Use and disclosure

We will use any personal information collected via our website in accordance with our privacy policy.

We reserve the right to update our policies at any time without notice. The latest versions of our policies can be found at www.bloomspeechtherapy.nl/policies.

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