neurhythmic

NEUROFEEDBACK

Privacy policy

Much of what you share with us is personal and sensitive, and we treat it with great care. This policy explains what information we collect, why we need it, how we keep it safe and the choices you have.

Who we are

Neurhythmic is the trading name of Edwina Dowling, an independent neurofeedback practitioner. In this policy, "we", "us" and "our" mean Neurhythmic. We are the "data controller" for the personal information you give us, which means we decide how it is used and are responsible for looking after it under UK data protection law (the UK General Data Protection Regulation and the Data Protection Act 2018).

We are registered with the Information Commissioner's Office (ICO), reference number C2093414.

We work alongside other independent neurofeedback practitioners in Guildford and Southampton. Each of us runs our own practice and is responsible for our own clients' information. We never share your identifiable details with them without your permission.

The information we collect

We only collect what we need to provide safe, effective care. This may include:

- **Contact details:** your name, address, email address, phone number and date of birth. For children, we also collect the details of their parent or guardian.
- **Health and background information:** your medical history, diagnoses, medication, symptoms, wellbeing questionnaires and what you hope to achieve from neurofeedback.
- **Session records:** recordings of brain activity (EEG) taken during sessions, the training settings we use, session notes and progress measures.
- **Referral information:** details shared with us by a GP, psychiatrist or other professional who refers you, with your knowledge.
- **Appointments and payments:** booking history, invoices and payment records. We do not store your full card details.
- **Website enquiries:** anything you send us through our contact form or by email.

Health information is "special category" data under data protection law, and we give it extra protection.

How we use your information

We use your information to:

- reply to your enquiry and decide together whether neurofeedback is right for you
- plan, deliver and review your sessions, and track your progress
- arrange appointments and send reminders
- send invoices and keep financial records
- keep in touch with the professional who referred you, if you agree
- meet our legal, insurance and professional obligations, including safeguarding

We do not use your information for marketing unless you have asked us to, and we never sell it.

Our legal reasons for using it

Data protection law requires us to have a lawful reason for each use of your information. Ours are:

- **Contract:** to provide the sessions you have agreed to have with us.
- **Legal obligation:** for example, keeping financial records for HMRC and acting on safeguarding concerns.
- **Legitimate interests:** to answer enquiries and run our practice in a reasonable way that you would expect.
- **Explicit consent:** for your health information. We ask for this in writing before your first session. You can withdraw it at any time, although we may then be unable to continue your sessions, and we may still need to keep some records for legal reasons.

Children and young people

Many of the people we work with are children. When a child comes to us, a parent or guardian gives consent and receives information on their behalf. We also explain things to the child in a way that suits their age and understanding.

As young people grow older and are able to understand what is involved, they may make decisions about their own information, including whether it is shared with their parents. We will talk this through with each family.

Who we share it with

Your information is confidential. We only share it:

- **With your consent:** for example, with your GP, the psychiatrist or professional who referred you, or your child's school.
- **For clinical supervision and peer support:** we may discuss cases with other qualified practitioners to make sure you receive the best care. We remove anything that could identify you.
- **With trusted service providers:** the companies that host our website, email, records, scheduling, payments and neurofeedback software. They only act on our instructions and must keep your information secure.
- **When the law requires it:** if we believe you or someone else is at risk of serious harm, if there is a safeguarding concern about a child or vulnerable adult, or if a court orders us to. Where it is safe and appropriate, we will tell you first.

Information stored outside the UK

Some of our service providers, including our website platform, Wix, may store information outside the UK. When this happens, we make sure it is protected by safeguards approved under UK law, such as the UK's adequacy regulations or approved contract terms.

How we keep it safe

We keep electronic records on password-protected, encrypted devices and secure systems, and any paper records in a locked cabinet. Only your practitioner can access your records. If something ever went wrong that put your information at risk, we would act quickly and tell you and the ICO where the law requires.

How long we keep it

We keep information only for as long as we need it, in line with professional guidance and our insurance

requirements:

- **Adult client records:** 8 years after your last session.
- **Children's records:** until their 25th birthday, or their 26th if they were 17 when sessions ended.
- **Financial records:** 6 years, as required for tax purposes.
- **Enquiries that don't lead to sessions:** 12 months.

After this, we delete or securely destroy it.

Our website and cookies

Our website is built on Wix. When you visit, Wix uses cookies, small files stored on your device, to make the site work and keep it secure. With your permission, it may also use cookies that help us understand how visitors use the site, so we can improve it. You can choose which cookies to accept in the cookie banner, and change your mind at any time.

If you use our contact form, the details you enter are sent to us through Wix so we can reply.

Your rights

You have the right to:

- ask for a copy of the information we hold about you
- ask us to correct anything that is wrong or incomplete
- ask us to delete your information, where we don't have to keep it by law
- ask us to limit how we use it, or object to how we use it
- ask for your information in a format you can take elsewhere
- withdraw your consent at any time

To use any of these rights, just contact us. It's free, and we will respond within one month.

Contact us

If you have any questions about this policy or how we use your information, please get in touch:

Email: edwina@neurhythmic.com

Phone: 07595 221 459

If you're not happy

If you have a concern about how we have handled your information, please tell us first so we can try to put it right. We will acknowledge your complaint within 30 days and let you know what we are doing about it.

If you are still unhappy, you can complain to the Information Commissioner's Office, the UK's independent data protection regulator, at ico.org.uk/make-a-complaint or on 0303 123 1113.

This policy was last updated in November 2026 and will be reviewed each year.