

# Privacy Notice: Kim Whitaker Limited

**Effective Date:** April 2026

This notice explains how Kim Whitaker Limited ('we', 'us', 'our') handles your personal information across our services and websites, including drkimwhitaker.com and adhd-specialist.net.

## 1. Who We Are

Kim Whitaker Limited is the Data Controller responsible for your personal information.

**Principal Psychologist:** Dr Kim Whitaker, DClinPsy (HCPC: PYL 22793). **Data Protection Lead:** Dr Kim Whitaker. **Contact:** admin@drkimwhitaker.com | 0161 5490866. **Registered Address:** C/O Ppi Accountancy Limited, Horley Green House, Halifax, HX3 6AS. **Company Number:** 06688117. **ICO registration number:** ZA205771.

## 2. Information We Collect

The nature of the information we process depends on your engagement with the practice:

- **Identity & Contact:** Name, date of birth, address, and contact details.
- **Clinical Data (Special Category):** Medical and psychological history, diagnoses, medications, assessment scores, and clinical session notes.
- **Legal Data:** For medico-legal or court cases, we process instructions, court orders, and disclosed medical evidence.
- **Professional Data:** For clinicians in supervision, we process professional details and anonymized case material.
- **Technical Data:** IP addresses and cookies collected when you visit our websites. Our websites may use essential and analytics cookies. Where required, we obtain your consent via a cookie banner.

## 3. How We Collect Your Data

We collect data through:

- **Direct Interactions:** Information you provide via forms, emails, or during consultations.
- **Third Parties:** We often receive data from instructing solicitors, the Courts, health insurance providers, or your GP.

## 4. Why We Use Your Information (Lawful Basis)

Under UK law, we must have a valid justification for processing your data.

Purpose	Lawful Basis (UK GDPR)	Special Category Condition
ADHD/ASD Assessments	Contract (for provision of services) and explicit consent (for processing special category data)	Explicit Consent or Health Care
Medico-Legal Reports	Legal Obligation or Public Task	Legal Claims & Proceedings
Court-Ordered Cases	Legal Obligation	Substantial Public Interest
Clinical Supervision	Contract / Legitimate Interests	N/A (Anonymized)
Website Inquiries	Consent	Explicit Consent (if health data)

Where we rely on legitimate interests, these include the effective operation of the practice and provision of supervision services.

## 5. Enhanced Clinical Processing Tools

We utilize specialist technology to ensure high standards of clinical accuracy. We maintain a **"Human-in-the-Loop"** approach; no automated clinical decisions are made without Dr Whitaker's oversight.

### 5.1 Medical Record Summarization (MediScan AI)

- **Clinical Purpose:** To organize and summarize extensive medical records provided for review.
- **Security:** Data may be processed in the USA under the **UK-US Data Bridge**, ensuring UK-equivalent protection.
- **Privacy:** Your data is not used to train AI models.

### 5.2 Clinical Note-Taking Assistance (NovoNote)

- **Clinical Purpose:** Allows the clinician to focus on the patient while ensuring an accurate written record.
- **Data Handling:** Audio is deleted immediately after transcription. Transcripts are stored in Australia, a country recognized by the UK for **Adequate** data protection.
- **Privacy:** Content is pseudonymized and not used to train AI models.

## 6. Information Sharing

We do not sell your data. We share information only with:

- **Instructing Parties:** Solicitors, Courts, or the CICA as required by legal proceedings.
- **Healthcare Providers:** Your GP or other clinicians (only with your explicit consent).
- **Required Processors:** Practice management systems (e.g., WriteUpp) and tools mentioned in Section 5.
- **Safety Exceptions:** We may share data without consent if there is a serious risk to life or a statutory safeguarding requirement.
- **Data Processors:** Data processors acting on our behalf under strict data protection agreements.

## 7. Data Security

We take the security of your information seriously. Our measures include:

- **Encryption:** All digital records are encrypted at rest and in transit.
- **Access Control:** Role-based access and password-protected devices.
- **Network Security:** Use of VPNs for remote access to practice systems.
- **Staff Oversight:** Annual data protection training and signed confidentiality undertakings for all staff.

## 8. Data Retention

Record Type	Retention Period
Adult Clinical/Legal Records	7 years from last contact or conclusion of case.
Child Clinical Records	Until the 25th birthday or 7 years from last contact (whichever is longer).

Financial Records	6 years (HMRC requirement).
General Inquiries	6 months if an engagement does not proceed.

## 9. Your Rights

Under the UK GDPR, you have the right to:

- **Access** your data (Subject Access Request).
- **Rectify** inaccuracies.
- **Erase** data (subject to clinical/legal retention obligations).
- **Object** to or **Restrict** processing of your data.
- **Withdraw Consent** for AI tools or GP sharing at any time.

**Complaints:** You can contact the ICO ([ico.org.uk](http://ico.org.uk)) or reach out to us directly to resolve concerns. Kim Whitaker Limited is registered with the Information Commissioner's Office (ICO), registration number: ZA205771.

**Kim Whitaker Limited** | [www.drkimwhitaker.com](http://www.drkimwhitaker.com) | [www.adhd-specialist.net](http://www.adhd-specialist.net)