

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.

5.3 Report Proofreading Assistance (Claude Teams)

- **Clinical Purpose:** To assist in checking completed assessment reports for spelling, grammar, and internal consistency before finalisation, ensuring the highest standard of written reporting.
- **Data Handling:** Completed report text may be submitted to Claude Teams, provided by Anthropic PBC (USA). Dr Whitaker reviews every suggestion individually and applies only those she agrees with manually. No changes are made automatically. Data is deleted after 30 days.
- **Security:** Data is transferred to the USA under Standard Contractual Clauses (SCCs), the approved UK legal mechanism for such transfers. Anthropic holds ISO 27001:2022 and SOC 2 Type II certification.
- **Privacy:** Your data is not used to train AI models. This is a contractual prohibition under Anthropic's Commercial Terms, not merely a policy statement.

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) 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 | www.adhd-specialist.net