
ARBOR NEUROREHABILITATION SERVICES LIMITED

RECORD OF PROCESSING ACTIVITIES

Arbor Neurorehabilitation Services Limited's Record of Processing Activities

Arbor Neurorehabilitation Services Limited also referred to as **"Us, We, Our"** is compliant with Article 30 of the EU's version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR). This requires data controller, like Us, to keep detailed documentation of all data processing activities.

This record (Record) outlines how We process personal and special category data. This Record is classed as confidential information, but We will provide a copy of this to the Information Commissioner's Office, if we are requested to under Article 30.

OUR DETAILS:	
Name:	Arbor Neurorehabilitation Services Limited
Address:	Henleaze Business Centre, Harbury Road, Bristol, England, BS9 4PN
Contact Number:	0117 287 2088
Email Address:	info@arbor-neuro.com
Website:	www.arbor-neuro.com

1. OUR DATA CATEGORY COLLECTION

We collect personal data from the following data subject categories:

- 1.1.** Our patients/clients;
- 1.2.** Our suppliers;
- 1.3.** Our associates.

2. THE TYPE OF DATA WE COLLECT FROM OUR PATIENTS/CLIENTS

- 2.1.** We collect personal data from our patients, such as:

- a) **Personal information**, such as name, contact details and any other information provided to Us;
- b) **Personal background information**, including details about lifestyle, family and personal experiences;
- c) **Device information**, meaning information about the device used to access our services;
- d) **Location data**, including approximate location, which may be determined using an IP address or GPS;
- e) **Technical data**, meaning information collected automatically, such as IP addresses and information collected via cookies;
- f) **User behaviour and preferences**, meaning data about how Our services are used, including your browsing history, preferences and activities;
- g) **Financial and payment information**, if applicable, details about financial situations or transactions related to Our services, and credit card or other payment information used to purchase Our services;
- h) **Browsing history**, including information about websites visited and the content accessed through our services; and
- i) **Service details**, including information about the specific services used and agreement to our terms and conditions; and
- j) **Special category data**, in particular health data, including data about patient health, previous and existing medical conditions, psychological health history, physiotherapy information, speech and language information, occupational therapy information, psychiatric health history, general medication information, and any other relevant health information that allow Us to work with Our patients.

3. THE TYPE OF DATA WE COLLECT ABOUT OUR ASSOCIATES

3.1. We collect the following types of personal data about our employees, associates and job applicants:

- a) Personal information, including name, contact details, and any other information provided;
- b) Date of birth;
- c) Gender;
- d) Marital status;
- e) Emergency contact and beneficiary details;
- f) Relevant government identification numbers, such as a national insurance number;
- g) Details about education and training;

- h) Financial information such as bank account details;
- i) Information about salary and benefits;
- j) Performance information;
- k) Employment details including employment history;
- l) DBS Checks;
- m) ICO registration details;
- n) Details about the type of work they carry out and type of client (adult/paediatrics, etc.); and
- o) Special category data, such as data relating to an employee or an associate's political opinion, religious belief, racial or ethnic origin, trade union membership, genetics, biometrics or health, and sexual orientation or sex life.

4. THE TYPE OF DATA WE COLLECT ABOUT OUR SUPPLIERS

4.1. We collect the following types of personal data about Our suppliers:

- a) Name and contact information, such as an address; and
- b) Financial and payment details.

5. WHY WE PROCESS DATA

5.1. We collect and process personal data about our patients for the purposes outlined below:

- a) Improving and maintaining Our services;
- b) Offering therapy and client support;
- c) Managing client accounts;
- d) Promoting Our services through direct marketing;
- e) Auditing Our operations and processes;
- f) Ensuring the security of Our network and systems;
- g) Adhering to legal and regulatory requirements (including supervision and safeguarding purposes);
- h) Identifying and preventing fraudulent activities; and
- i) Analysing website data.

5.2. We collect and process personal data about our associates for the purposes outlined below:

- a) Using associates to help with the provision of our services to clients;
- b) Monitoring associate performance; and
- c) Handling administrative tasks related to associates such as paying invoices, etc.

5.3. We collect and process personal data about suppliers for the purposes outlined below:

- a) Purchasing goods and services;
- b) Managing supplier relationships, orders and payments; and
- c) Assessing potential suppliers for suitability.

6. WHO WE SHARE DATA WITH

6.1. We share personal data with the following recipients:

- a) Other healthcare professionals;
- b) Case Managers and referrers;
- c) Litigation solicitors and deputyships;
- d) Business partners;
- e) Regulatory bodies;
- f) Auditors and consultants, such as lawyers;
- g) Law enforcement officials;
- h) Third-party service providers, such as:
 - (i) IT system management companies;
 - (ii) Virtual assistant providers;
 - (iii) Information security providers;
 - (iv) Practice management software companies; and
 - (v) Accounting and bookkeeping firms.

6.2. We only share a limited amount of personal data when absolutely necessary (in accordance with Article 49(1)) for our business interests. We take steps to protect this data through contractual clauses, and other appropriate safeguarding mechanisms.

7. HOW WE KEEP OUR DATA SECURE

7.1. We have implemented the following security measures to protect personal data:

- a) Making the data anonymous;
- b) Protecting personal data with encryption;
- c) Using cloud storage solutions that comply with data privacy regulations;
- d) Keeping personal data separate from other information;
- e) Limiting access to personal data and verifying user identities;
- f) Educating associates about data security best practices; and
- g) Having clear guidelines for data security practices.

8. OUR DATA RETENTION PROCESS

- 8.1.** We only keep personal information for as long as we need it, for the reasons we collected it, to satisfy any legal, regulatory, accounting or reporting obligations, or as required to resolve disputes. We won't keep any personal data longer than necessary, unless we are required to by law.
- 8.2.** When determining the appropriate time period to retain data, We consider the nature, amount, sensitivity, potential risk of harm from unauthorised use, the purpose of collection, any regulatory or legal requirements, and whether we can fulfil the purposes of processing by other means.
- 8.3.** Arbor-Neurorehabilitation Services Limited retains personal data for the following periods (subject to any exceptional circumstances e.g., to comply with laws or regulations that require us to retain the data for a specific period):
 - a) Information about Our patients such as:
 - (i) name and contact information: 7 years or until the child's 25th birthday;
 - (ii) lifestyle and family details: 7 years or until the child's 25th birthday;
 - (iii) health data: 7 years or until the child's 25th birthday;
 - (iv) neuropsychological test data for 20 years;
 - (v) location details as per the cookie duration as set out in our cookie policy;
 - (vi) electronic data that is identifiable, such as IP address and information gathered by cookies as per the cookie duration as set out in our cookie policy; and
 - (vii) contractual details including the services We provide: 7 years.
 - b) Information about Our associates as follows:
 - (i) personal details such as name and contact information: 6 years;
 - (ii) date of birth: 6 years;

- (iii) gender: 6 years;
 - (iv) marital status: 6 years;
 - (v) emergency contact information and beneficiary details: 6 years;
 - (vi) government identification numbers: 6 years;
 - (vii) education and training details: 6 years;
 - (viii) employment details: 6 years; and
 - (ix) special categories of personal data (race, ethnicity, political opinions, religious beliefs, trade union membership, genetics, health, sex life or sexual orientation): 6 years.
- c) Information about Our suppliers, such as:
- (i) name and contact information: 6 years;
 - (ii) financial and payment details: 6 years.

9. CHANGES TO THIS RECORD OF PROCESSING ACTIVITIES

- 9.1.** Arbor Neurorehabilitation Services Limited may amend this Record from time to time as needed to comply with the relevant UK data protection laws.

10. LAST MODIFIED

- 10.1.** This document was last modified on 16 October 2025.