

# GDPR 2018 PRIVACY NOTICE



## Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**1 - Your Practice Heathfield Osteopaths**, based at **92 High Street, Heathfield, TN21 8JD** which hereafter for the purposes of this Privacy Notice will be referred to as Heathfield Osteopaths, is pleased to provide the following information:

## 2 - Who we are

Heathfield Osteopaths diagnose and treat health conditions. Treatments are carried out in accordance with the Institute of Osteopathy's patient charter <http://www.iosteopathy.org/osteopathy/the-patient-charter/>. **The practice may also provide other treatments, about which our staff will be pleased to provide more details.**

## 3 - Personal Data

- a) For the purposes of providing treatment, Heathfield Osteopaths may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Heathfield Osteopaths to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment. As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners e.g GPs, consultants, surgeons and/or medical insurance companies. Where this is required we will always inform you first unless we are under a legal obligation to comply.
- b) For marketing purposes, Heathfield Osteopaths may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.
- c) In making initial contact with the practice you consent to Heathfield Osteopaths maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. Osteopaths may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us. Heathfield Osteopaths do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this Privacy Notice.
- d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.
- e) Heathfield Osteopaths' website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. **WordPress.org** uses cookies to help Heathfield Osteopaths to identify and track visitors and their website access preferences. Heathfield Osteopaths' website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Heathfield Osteopaths' website.
- f) Heathfield Osteopaths will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

## 4 - Legal basis for processing any personal data

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

## 5 - Legitimate interests pursued by Heathfield Osteopaths

To promote treatments for patients with all types of health problems indicated for osteopathic care.

## 6 - Consent

Through agreeing to this privacy notice you are consenting to Heathfield Osteopaths processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.

## 7 - Disclosure

Heathfield Osteopaths will keep your personal information safe and secure, only staff engaged in providing your treatment will have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Heathfield Osteopaths will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

## 8 - Retention Policy

Heathfield Osteopaths will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

## 9 - Data storage

All Data is held in the United Kingdom. Heathfield Osteopaths does not store personal data outside the EEA.