

UK GDPR 2021 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 UK General Data Protection Regulation (GDPR) and The Data Protection Act 2018, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of UK data subjects. These rights cover the safeguarding of personal data and protection against the unlawful processing of personal data.

1 - Our Practice, Community Osteopaths, based at 146 Swanston Muir, Edinburgh EH10 7HY, is pleased to provide the following information:

2 - Who we are

Community Osteopaths diagnose and treat health conditions. Treatments are carried out in accordance with the Institute of Osteopathy's patient charter <http://www.ioosteopathy.org/osteopathy/the-patient-charter/>.

3 - Personal Data

- a) For the purposes of providing treatment, Community Osteopaths may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, or when we visit your home, 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 Community Osteopaths' Data Protection Officer and Clinic Manager. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Community 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, the 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) Community 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. Ionos.co.uk uses cookies to help the Osteopaths to identify and track visitors and their website access preferences. Visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Community Osteopaths' website.
- d) Community 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 Osteopaths

To promote treatments for patients with all types of health problems indicated for osteopathic care. The condition for processing is *UK GDPR Article 9(h) Health or social care with a basis in law*, which meets the associated condition in UK law, set out in Part 1 of [Schedule 1 of the DPA 2018: 2\(2\)\(d\) The provision of health care or treatment](#).

6 – Consent

Through agreeing to this privacy notice you are consenting to Community 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

Community Osteopaths will keep your personal data safe and secure. Osteopaths will not disclose your personal data unless compelled to, 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

Community 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

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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.

10 - Your rights as a data subject

At any point whilst Community Osteopaths are in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event Community Osteopaths refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request Community Osteopaths can confirm what data it holds about you and how it is processed.

11 - You can request the following information:

- Identity and the contact details of the person or organisation (Community Osteopaths) that has determined how and why to process your data.
- Contact details of the Data Protection Officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Community Osteopaths and information about these interests.
- The categories of personal data collected, stored, and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 - To access what personal data is held, identification will be required

Community Osteopaths will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Community Osteopaths is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to sarah@communityosteopaths.co.uk or by phoning +44 (0)7766 140740 or writing to us at the address below.

13 - Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Community Osteopaths you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

Sarah Emslie, Community Osteopaths, c/o 146 Swanston Muir, Edinburgh EH10 7HY

Telephone: 07891 573338, or email: sarah@communityosteopaths.co.uk

ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>