

# HILLSBOROUGH CHIROPRACTIC CLINIC

## PATIENT PRIVACY POLICY

### INTRODUCTION

Welcome to the Hillsborough Chiropractic Clinic's privacy notice.

The Hillsborough Chiropractic Clinic's respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you become a patient of this clinic (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### 1. **IMPORTANT INFORMATION AND WHO WE ARE**

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Hillsborough Chiropractic Clinic's collects and processes your personal data during and after your time as a patient.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### Controller

The Hillsborough Chiropractic Clinic's is the controller and responsible for your personal data (collectively referred to as "Hillsborough Chiropractic Clinic's", "we", "us" or "our" in this privacy notice).

The Hillsborough Chiropractic Clinic's operates the website:  
<https://www.chiropractorhillsborough.co.uk>

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

#### Contact details

Name: Hillsborough Chiropractic Clinic

Name or title of Data Privacy Manager: Sonja Low

Email address: [Gdpr@hillsgcc.co.uk](mailto:Gdpr@hillsgcc.co.uk)

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Telephone number: 0114 233553

### Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### Changes to the privacy notice and your duty to inform us of changes

This version was last updated in May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes [title, first name, last name, date of birth and gender].
- **Contact Data** includes [email address, home address, billing address and telephone numbers].
- **Special Category Data** includes information about your [health, genetics, sex life, sexual orientation, race, ethnic origin and religion].
- **Financial Data** includes [bank account and payment card details].
- **Transaction Data** includes [details about payments to and from you and other details of products and services you have purchased from us].

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. However,

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if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Special Category and Financial Data when you become a patient.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - (a) Referrers: who may provide us with Special Category data to facilitate your treatment with us.
  - (b) Insurance Companies: who may provide us with details of your insurance plan
  - (c) Solicitors who may refer you to us for treatment concerning a claim, they may provide us with Special Category Data

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

1. Where we need to **perform the contract** we are about to enter into or have entered into with you.
  - Performance of **contract means** processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
2. Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
  - **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.
3. Where we need to comply with a **legal or regulatory obligation**.

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- Comply with a **legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### Purposes for which we will use your personal data

#### 1. Performance of our contract with you

- To register you as a new patient or take steps to register you as a new patient.
- To comply with our obligations under our contract, namely to provide you with the necessary treatment.

#### 2. Legitimate interests

We rely on the legitimate interest basis to process your data in the following circumstances:

- To collect and **recover money owed** to us.

#### 3. Legal or regulatory obligation

- We also rely on the **legal or regulatory obligation** ground to process your data in some circumstances. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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### Condition under which we process your special category data

To process your special category data we rely on the contractual ground and also the special condition which allows health professionals to process the data for the **purposes of preventative or occupational medicine, and the provisions of health care treatment**.

Please contact us if you would like more details about the specific legal ground we are relying on to process your personal data.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you would like to receive marketing from us we ask for your express consent. Please refer to our Website and Marketing Privacy Notice for more details.

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in paragraph 4 above.

External Third Parties:

- **Professional healthcare practitioners** including x-ray reporters to report on x-rays, to facilitate a referral, to keep your GP informed and any locum chiropractors working for us to facilitate your continued treatment, other healthcare practitioners that we might refer you on to.
- **Service providers** based in UK who provide IT and system administration services.
- **Professional advisers** including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- **HM Revenue & Customs, regulators and other authorities** based in the United Kingdom who require reporting of processing activities in certain circumstances.

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Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

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## **6. INTERNATIONAL TRANSFERS**

Our Clinic patient database and cloud does not transfer your personal data outside the European Economic Area (EEA).]

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see European Commission: Binding corporate rules.]

Our marketing companies (website/ social media) may be based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.]

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA]

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. DATA RETENTION**

**How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

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To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- i. **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- ii. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- iii. **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.
- iv. **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- v. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- vi. **Request the transfer** of your personal information to another party.
- vii. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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**If you want to exercise any of the above rights, please contact Data Privacy Manager in writing.**

**No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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