



## Patient Privacy Notice

**Data controller:** The Clinic @ Limited (The Clinic@78)

### Our contact details

Name: Rachel Hall, Clinic Manager

Address: The clinic@78, 78 Poole Road, Bournemouth, BH4 9DZ

Phone Number: 01202 767000

E-mail: info@clinic78.co.uk

### Purposes of Collection

Your data is collected for the purpose of providing direct patient care; however, we can disclose this information if it is required by law, if you give consent or if it is justified in the public interest. The clinic may be requested to support research; however, we will always gain your consent before sharing your information with medical research databases such as the Clinical Practice Research Datalink and QResearch or others when the law allows.

Processing your information in this way and obtaining your consent ensures that we comply with Articles 6(1)(c), 6(1)(e) and 9(2)(h) of the GDPR.

### Collecting information

We will collect and use the following types of personal data about you:

- Your contact details and date of birth.
- The contact details for your emergency contacts (next of kin)
- Your gender.
- Your registered GP practice details.
- Personal and family medical history
- Your identification documents including passport and driving licence and information in relation to your immigration status and right to work for us.
- Your images (whether captured on CCTV, by photograph or video).
- Health related information such as diagnostic imaging, diagnostic test results, medical diagnoses, aesthetic procedure imaging.

- Details of treatment and care.
- Any other category of personal data as necessary to perform our legal, statutory and contractual obligations.

The clinic may collect this information in a variety of ways, for example from application forms, CVs or resumes, obtained from your passport or other identity documents such as your driving license, from forms completed by you at the start of or during employment (such as pensions benefit nomination forms), from correspondence with you, or through interviews, meetings or other assessments.

This personal data might be provided to us by you, or someone else, such as your doctor, or it could be created by us.

Your personal data will be stored in a range of different places, including third party processing systems. Any data sharing with third party processors will be controlled contractually and your data will be afforded all the same protections as that provided for under UK law. These third-party processors include the following platforms

- Heydoc
- Tricefy
- ViewPoint
- Ultraling
- CardioScan
- BeatBox
- SECA
- Vyaire
- WeType
- TDL

### **Processing your personal data**

The clinic will process your personal data (including special categories of personal data) in accordance with our obligations under the 2018 Act.

We will use your personal data for:

- Performing the contract of services between us
- Providing healthcare services
- To meet legal statutory or legal obligations or for the purposes of legal defence.

### **Special categories of personal data**

As we are providing healthcare services it is necessary and lawful for us to process special categories of data including data concerning health, ethnicity, race, and other special categories of data.

Where the clinic processes other special categories of personal data, such as information about, sexual orientation or religion or belief, this is done for the purposes of healthcare services provision or equality monitoring.

### **Automated decision-making**

We do not engage in any automated decision-making.

### Sharing your personal data

The clinic may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The clinic will not transfer your data to countries outside the European Economic Area.

It is clinic policy to update patients' registered NHS GP with details about their care at the clinic. All patients will be asked at point of registration if they consent to this contact being made. If consent is not provided then contact will not be made. Patients have the option of add or retracting consent at any stage by speaking to a member of the reception team at the clinic.

Patient information may also be shared with our clinical primary and secondary care settings, such as hospitals, as part of patients ongoing pathways and care. This will always be discussed with patients by the responsible clinician and/or a member of the clinic reception/admin team and verbal consent will always be obtained

### Data Sharing Summary Table

Data	Third Party
Clinic letters and test/investigation reports	NHS GP practices Secondary care settings
Ambulatory Holter and Blood Pressure Monitor data	CardioScan / BeatBox
Musculo-skeletal and Echocardiogram imaging	Ultraling
Obstetric and gynaecology imaging	ViewPoint and Tricefy
ECG	SECA
Spirometry	Vyair
Patient records and communications	Heydoc
Dictated clinical letters and correspondence	WeType
Lab sample processing and reports	TDL

### Protection of personal data

We are committed to maintaining confidentiality and protecting the information we hold about you. We adhere to the General Data Protection Regulation (GDPR), the NHS Codes of Confidentiality and Security, as well as guidance issued by the Information Commissioner's Office (ICO). You have a right to access the information we hold about you, and if you would like to access this information, you will need to complete a Subject Access Request (SAR). Please ask at reception for a SAR form and you will be given further information. Furthermore, should you identify any inaccuracies, you have a right to have the inaccurate data corrected.

Where the clinic engages third parties to process personal data on its behalf, they do so on the basis of written instructions and that they are under a duty of confidentiality

and are obliged to implement appropriate technical and practical measures to ensure the security of data.

### **Retention of data**

The clinic will hold your personal data for the duration of your employment and for a period following the end of your employment as set out in our Data Retention Policy/Schedule.

### **Your data subject rights:**

- You have the right to information about what personal data we process, how and on what basis as set out in this document
- You have the right to access your own personal data by way of a subject access request
- You can correct any inaccuracies in your personal data
- You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected
- While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made
- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop
- You have the right to object if we process your personal data for the purposes of direct marketing
- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month
- You have the right to be notified of a data security breach concerning your personal data
- With some exceptions, you have the right not to be subjected to automated decision making
- In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later.

If you would like to exercise any of these rights, or withdraw your consent, please contact Rachel Hall, Clinic Manager, [r.hall@clinic78.co.uk](mailto:r.hall@clinic78.co.uk).

### **Accessing your data**

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The clinic is legally required to act on requests and provide information free of charge with the exception of requests that are manifestly unfounded, excessive or repetitive.

If the clinic determines this to be the case we may charge a reasonable fee or refuse to act on the request. We will acknowledge your request and provide the information within one month of receiving your request. Please send your request to Rachel Hall, Clinic Manager, [r.hall@clinic78.co.uk](mailto:r.hall@clinic78.co.uk).

### **Lodging a complaint**

If you are not satisfied with our response or believe we are processing your personal information in a way that is not in accordance with the law, you have the right to lodge a complaint with the supervisory authority in the UK responsible for the implementation and enforcement data protection law: the ICO. You can contact the ICO via the following:

Website: <https://ico.org.uk/concerns/>

Telephone: 0303 123 1113