



## **Welcome to the Bourne Chiropractic & Rehabilitation's Patient Privacy Policy**

Bourne Chiropractic & Rehabilitation 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.

### **Important Information and Who we are**

This privacy notice aims to give you information on how Bourne Chiropractic & Rehabilitation collects and processes your personal data during and after your time as a patient.

Bourne Chiropractic & Rehabilitation is the controller and responsible for your personal data.

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:** Bourne Chiropractic & Rehabilitation

**Name or title of Data Privacy Manager:** Lucy Vickers

**Email address:** [info@bournechiropracticclinic.com](mailto:info@bournechiropracticclinic.com)

**Telephone:** 01252 794037

### **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 Policy and your duty to inform us of changes**

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

## **The Data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use and store 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
- Financial Data includes 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.

## **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:
- Referrers: who may provide us with Special Category data to facilitate your treatment with us. such as GP's or Specialists
- Insurance Companies
- Solicitors

## **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:

- 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.
- 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.

- Where we need to comply with a legal or regulatory obligation.
- 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:**

- 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.
- 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.
- 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.

### **Condition under which we process your special category Data**

To process your special category 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.

### **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 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.

### **Disclosures of 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 to facilitate a referral, any chiropractors or massage therapists working for us, and reception staff to facilitate your continued treatment.

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- \* Service providers based in UK through the janeapp secure healthcare system.
- \* 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.

If a change in ownership happens to our business we will inform you beforehand and with YOUR permission 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.

## **International Transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **Data Security**

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. Data is securely stored in digital form on the janeapp system which is double password protected.

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.

## **Data Retention**

How long will you use my personal data for?

- Currently we are required by law to hold your records for 8 years after which time records will be destroyed.

## **Your Legal Rights**

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

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.

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.

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.

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.

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.

Request the transfer of your personal information to another party.

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.

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.