

# Privacy Policy

## What is a Privacy Policy?

A privacy policy is a legal document that discloses the ways a party gathers, uses, discloses, and manages a client's data. Under data protection law, as a client of Summit Chiropractic Limited, you have specific rights in regard to your information being private. To communicate these rights to you in a clear and concise manner, we are providing you with this document; our updated privacy policy.

## Who We Are

Company name: Summit Chiropractic Limited

Address: 115 St. Albans Road, Watford, Herts, WD17 1RD

Phone number: 01923 236162

Email: watford@summitchiro.co.uk

For the purposes of processing your personal data we are the Data Controller.

## Data Protection Officer

As we record and use sensitive data we take the protection of this data very seriously. We have therefore appointed a Data Protection Officer, Victoria McDermott, who is your first point of contact for any matters regarding your personal data we process. The contact details are the same as above.

## The Data We Process and What We Do with It

We record and use the following categories of personal data which may include and is not limited to: name, address, telephone numbers and email address. In addition, we need to collect your health data to provide you with the best possible treatment. Your requesting treatment and our agreement to provide that care constitutes a contract. You can, of course, refuse to provide the information, but if you were to do that we would not be able to provide treatment. The collection of your data allows us to do our job effectively and safely. Furthermore, we may collect photographs and/or videos of you with your consent.

## Storing and Sharing Your Data

Your personal data is stored as follows:

- on paper, in locked filing cabinets. The clinic is always locked and alarmed out of working hours;
- electronically (“in the cloud”), using a specialist medical records service called Practice Hub. Access to this data is password protected and passwords are changed regularly. Practice Hub has provided their updated terms, privacy policy and data processing agreement;
- on our office computers. These are password-protected, backed up regularly, and the clinic is locked and alarmed out of working hours.

We will never share your data with anyone who does not need access without your explicit consent. Only the following people/companies will have routine access to your data:

- Practice Hub, the specialist medical records service who store and process our files, and send automated text message reminders;
- Your Chiropractor(s) in order that they can provide you with treatment;
- A locum Chiropractor in order that they can provide you with treatment;
- Our reception staff, because they organise the client diaries, and co-ordinate appointments and reminders;
- Other administrative staff;
- We also use Chiro Matrix and Mail Chimp to co-ordinate our emails, so your name and email address may be saved on their server. Occasionally we may send you general health information in the form of articles or newsletters. Consent can be withdrawn at any time.

We want you to be confident that we are treating your data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

### **Retaining Your Data**

We have a legal obligation to retain your records for 8 years after your last appointment if you were 18 years of age or older at the time. Records will be kept for those under 16 until your 25<sup>th</sup> birthday, and for those aged 17 years of age until your 26<sup>th</sup> birthday. After this period your records will be securely destroyed.

### **Your Rights**

- You may request a copy of your data at any time. Please make such a request in writing or by email. Any copies of data you require will need to be signed for before they are released to you.
- If you believe any of the personal data we hold on you is inaccurate or incomplete, please contact us directly and any necessary corrections to your data will be made without undue delay.
- If you believe we should erase your data, please contact us. Be aware of our legal right to retain your data for set periods of time before we can destroy it.
- Where you have provided explicit consent for us to use your data you have a right to withdraw this consent at any time.

### **Data Breaches**

Should your data that we control be lost, stolen or otherwise breached, where this constitutes a high risk to your rights and freedoms, we will contact you without delay. We will explain to you the nature of the breach and the steps we are taking to deal with it.

### **Should You Wish to Complain**

If you feel that we are mishandling your data, you have the right to complain. Complaints need to be sent to the Data Protection Officer, Victoria McDermott.

If you are not satisfied with the response, you can contact the Information Commissioner's Office via their website: [www.ico.org.uk](http://www.ico.org.uk) should you wish to make a complaint about the way we are processing your personal data.