



St Margarets Foot Clinic

Privacy Policy at St Margarets Foot Clinic - 2018

1. This privacy policy covers the collection, processing and use of personal data under the Data Protection Act 1998 (DPA) and General Data Protection Regulations (GDPR). The policy applies to your personal data on Ovatu for on-line bookings and Paper Clinical Notes. We do not hold any personal data on our website.
2. We are data controllers for the purpose of DPA and GDPR. If you have any queries regarding your personal data collection or the processing of your personal data, you can contact Mrs Baljit Brar at enquiries@stmargaretsfootclinic.co.uk.
3. We will hold and process your personal data that you have provided to us in accordance with DPA and GDPR.
4. We are registered with the Information Commissioner's Office.

Providing consent & the data we collect

5. By using **Ovatu** (appointment system on-line and in-clinic) you will be asked to consent to this Privacy Policy.
6. On the day of your appointment with us you will complete a **Patient or Pilates Registration Form** which requests your agreement to having read this Privacy Policy, plus, if you wish to receive the e-newsletter, and also consent for us to correspond to pertinent third parties (i.e. your G.P.). Please read the registration form carefully before signing.
7. Ovatu collects personal data which is directly provided to us by you. E.g. your email address, name, phone number(s).
8. We also collect personal data on paper clinical notes, where we will request information about your health, medication, surgical history, etc. to enable us to assess, diagnose and treat your presenting complaint.
9. **Exclusions:** We do not collect sensitive data such as your race, religion, political affiliations, these are not relevant to the services we provide.

Use of your information

10. By providing your email address in Ovatu, or using the Patient/Pilates registration form, you automatically consent to it being used for the purpose of:
 - 10.1 Appointment reminder emails (Only one appointment reminder email is sent, usually 24 hours before the appointment.)
 - 10.2 Notifications of appointment changes
 - 10.3 Notifications of payment issues
 - 10.4 Queries – relating to your selected service.
11. If consented to, we will use your email address for the purpose of:
 - 11.1 Sending e-newsletters (no more frequent than one a month, but usually quarterly).
 - 11.2 Sending copies of medical correspondence /referral request letters.
12. The information that we collect and store relating to you is primarily used to enable us to provide our services to you, and to meet our contractual commitments to you.

Disclosure of your information

13. We may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection, investigations, legal cases, etc.
14. Where you have consented for us to do so, we may provide your data to selected third parties such as your G.P., for the purpose of continued medical intervention and referral, etc.

Controlling the use of your data

15. If you have any queries about our use of your personal data (that we hold) you can write to us via email – To Mrs Baljit Brar enquiries@stmargaretsfootclinic.co.uk . This includes if you wish to opt out of any consented uses of your personal data.

Transfer of your personal data

16. We may disclose your personal data outside of our group (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and (b) if St Margarets Foot Clinic's business is bought by a third party, in which case personal data held by it about its customers will be one of the assets to transfer to the buyer. However, any such transfer will only be on terms that the confidentiality of your personal data is protected and that the terms of this privacy policy will continue to be complied with by the recipient.
17. Otherwise, we will process, disclose or share your personal data only if required to do so by law or in good faith belief that such action is necessary to comply with legal requirements or legal process served on us or the website.
18. We do not use your individual personal details for marketing purposes.

Security

19. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Third party links

20. You may find links on our website (from time-to-time) to other websites. These websites must have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies or their website whatsoever as we have no control over them.

Your rights

21. The DPA and GDPR give you the right to access information held about you by us. Please contact us by email if you wish to request confirmation of what personal information we hold relating to you. We will provide this information within one month of your requesting the data. There will be a charge for this.
22. According to UK law, adult patient's clinical records have to be kept for **7 years (seven)** after the patient's last appointment. For children, or young adults under the age of **18 years (eighteen)**, they are kept until their **25th birthday (twenty-fifth)**. For mental health patients (within the meaning of the Mental Health Act 1983), for **20 years (twenty)** after their last treatment.
23. Disposal of clinical records: after the allotted time has expired, clinical notes can be shredded on site or we can elect a commercial contractor who will provide a 'waste transfer note'.
24. Your right to be forgotten: you may request via email that your personal data be erased from our system (excluding clinical notes, they have to be retained by law – see clause 22).

Changes in policy

25. We may update this privacy policy to reflect changes to the DPA and/or GDPR. Please regularly review these policies to be informed of how we are protecting your personal data.

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