

GDPR 2018 Privacy Notice For Walnut Tree Physiotherapy

This document refers to personal data, which is defined as information concerning any living person that is not already in the public domain.

The **General Data Protection regulation (GDPR)** which is EU wide seeks to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

Walnut Tree Physiotherapy based at **Walnut Tree Surgery, 14 Carlton Road, Southampton SO15 2HQ**, which hereafter the purposes of this privacy notice will be referred to as **the physiotherapists**, is pleased to provide the following information:

Who we are: Physiotherapists diagnose and treat health conditions. Treatments are carried out in accordance with the Chartered Society of Physiotherapy.

Personal data

For the purposes of providing treatment, physiotherapists may require detailed medical information. **We will only collect what is relevant and necessary to your treatment.** When you visit our practice, we will make notes which may include details concerning medication, treatment and any other issues affecting your health. We hold your data as we have a legal requirement and legitimate interest to do so in order to meet our contractual obligations

This data is always held securely **and is not shared with anyone not involved in your treatment.** To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow physiotherapists to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning the treatment.

For marketing purposes, the physiotherapists may also use your contact details to respond to your enquiries, including making telephone contact and emailing information to you which our practice believes may be of interest to you.

In you having made the initial contact with this practice you consent to physiotherapists maintaining a marketing dialogue with you until you **either opt out (which you can do at any time)** or we decide to desist in promoting our services. **Physiotherapists do not broker your data** and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this privacy notice.

Some basic personal data may be collected about you from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet protocol (IP) addresses.

Our physiotherapy website uses cookies. Physiotherapy website visitors who do not wish Cookies placed on their computers should set their browsers to refuse cookies before using the physiotherapy website.

Consent

Through agreeing to this privacy notice you are consenting to physiotherapists processing your personal data for the purposes outlined. You can withdraw your consent any time by using the postal, email address or telephone number provided at the end of this privacy notice.

Disclosure

The Physiotherapists will keep your personal information safe and secure; only staff engaged in providing a treatment will have access to your patient records. Physiotherapists will not disclose your personal information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its terms and conditions, including investigating potential violations of its terms and conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

Retention policy

Physiotherapists will process personal data during the duration of any treatment and will continue to store only the personal data needed eight years after the contract has expired to meet any legal obligations. After

eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

Data storage

All data is held in the United Kingdom. Physiotherapists do not store personal data outside the EEA.

Your rights as a data subject

At any point whilst physiotherapists are in possession of, or processing of personal data, all data subjects have the following rights:

- **Right of access** - you have the right to request a copy of the information that we hold about you.
- **Right of rectification** - you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** - in certain circumstances you can ask the data we hold about you to be erased from our records.
- **Right of restriction of processing** - where certain conditions apply you have a right to restrict the processing.
- **Right of portability** - you have the right to have the data we hold about you transfer to another organisation.
- **Right to object** - you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing**, including profiling - you also have the right not to be subject to the legal effects of automated processing of profiling.

In the event that a physiotherapist refuses to request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request physiotherapists can confirm what information they hold about you and how it is processed. You can request the following information:

- Identity and the contact details of the person or organisation that is determined how and why to process your data.
- Contact details of the data Protection Officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of physiotherapy and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- The source of personal data if it wasn't collected directly from you.

To assess what personal data is held, identification will be required. Physiotherapist will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the physiotherapist is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to hazel@Southamptonphysiotherapy.com or by phoning +44 (0) 7761277343 or writing to us at the address further below.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by physiotherapists you have the right to complain to us. If you do not get a response in 30 days, you can complain to the ICO.

The details for each of these contacts are:

- Hazel Dorman hazel@southamptonphysiotherapy.com 07761277343
- John Turnbull john@southamptonphysiotherapy.com 07866451927
- ICO, Wycliffe House, water Lane, Wilmslow, SK9 5AF. Telephone +44 (0) 3031231113 email <https://ico.org.uk/global/contact-us/email/>