

COCKERMOUTH CHIROPODY/PODIATRY Ltd
PRIVACY POLICY

The new General Data Protection Regulation came into effect on 25th May 2018 and as part of this we have updated our privacy policy which is written below for your information.

This Privacy Policy describes how and when Cockermouth Chiropody/Podiatry Ltd. collect, use, and share information when you attend an appointment at our clinic, purchase a product from us, contact us, or otherwise use our services. This is to comply with the General Data Protection Regulations (GDPR) 2018. This private notice policy is part of a formally documents information governance system and will be subject to periodic review. By disclosing personal information, using our services or website, whether verbally or in writing you are consenting to this policy. Adele Holmes, as the Data Controller for Cockermouth Chiropody/Podiatry Ltd is Registered with the ICO (Information Commissioners Office) Registration Number: ZA280862

1. Personal Information We Collect

To aid your treatment or as part of purchasing something from my business you will normally provide us with certain information, such as your name, email address, postal address, telephone numbers, date of birth, next of kin, GP practice, medical information, unique patient number assigned to you and payment information. This information would be disclosed through different formats; verbally in person or telephone, email, Facebook, 'Contact Us' page on the website or text message. I will store your information in the original paper form, which you completed on your first appointment, in locked filing cabinets, locked desk drawer, clinic on the day of your appointment when the podiatrist is present or will be held by the receptionist/podiatrist on the day of your home visit appointment. Your information will also be stored on an electronic patient record and diary system on Private Practice Management System Podiatry UK based cloud

which is fully password protected. It will also be stored on password protected company email accounts and Facebook messenger until it has been up loaded to your patient record as soon as possible when after this it will be deleted. Each computer or laptop it is accessed from is also individually password protected.

2. Why I Need Your Information and How I Use It

I rely on a number of legal bases to collect, use, and share your information, including:

- where it is necessary for the purposes of the provision of health care as needed to provide our services, such as when we use your information to fulfil your podiatry assessment and treatment, booking an appointment or to provide customer support;
- when you have provided your affirmative consent, which you may revoke at any time, such as by signing up for our text reminder or to contact a further medical professional such as your GP;
- if necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law;
- your unique patient number will be stored by third party (the associate podiatrist carrying out your podiatry treatments) in their annual account notebook to calculate their fee, which is stored in the locked desk drawer;
- if you make payment by bank transfer this payment information will be used in accordance with compiling the company accounts;
- if you make a payment through the IZettle card machine and choose to get a receipt, your contact information will be stored in their cloud based in Sweden to be used to email your receipt and then have faster access if using the same card on another IZettle machine, they will not disclose this information without your consent.
- If you use the Lloyds Bank Card machine(Cardnet) to make a payment we are Payment Card Industry Data Security Compliant (PCIDSS) compliant. Please refer to www.pcisecuritystandards.org and www.lloydsbankcardnet.com for more details.

- **3. Marketing**

In the future I may wish to send you direct marketing material which may include product offers and newsletters. If you are happy for me to do this please indicate on your paper patient form in what forms you would like to receive this information.

4. Information Sharing and Disclosure

Information about my patients/customers is important to my business. We share your personal information for very limited reasons and in limited circumstances, as follows:

- Medical professionals. With your consent we will share information with medical professionals such as your GP or consultant to allow continuity of care.
- Service providers. I engage certain trusted third parties to perform functions and provide services to my business, such as the diary system Private Practice Management System and their UK based cloud. I will share your personal information with these third parties, but only to the extent necessary to perform these services.
- Business transfers. If I sell or merge my business, I may disclose your information as part of that transaction, only to the extent permitted by law and with your consent.
- Compliance with laws. I may collect, use, retain, and share your information if I am legally required to.

5. Data Retention

I retain your personal information only for as long as necessary to provide you with my services and as described in my Privacy Policy. However, I may also be required to retain this information to comply with my legal and regulatory obligations, to resolve disputes, and to enforce my agreements. The retention of podiatry records is normally a minimum of 8 years, after the last appointment or after death, in this case they are archived in the locked locker. For customers who are not patients but may have bought

products from my business I will keep any data you may have provided for a minimum of 6 years in line with tax legislation. If you are a young person your data will be retained, unless you continue with regular treatments, until you are 25 years of age.

6. Transfers of Personal Information Outside the EU

I may store and process your information through third-party hosting services in the US and other jurisdictions in the future. As a result, I may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If I am deemed to transfer information about you outside of the EU, I will rely on a secure basis i.e. Privacy Shield as the legal basis for the transfer. There will be a notification in the waiting room if this does occur.

7. Your Rights

You have a rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. I describe these rights below:

- Access. You have the right to access and receive a copy of the personal information we hold about you by contacting me using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict our use of, or delete your personal information. In the case of health records these are normally exempt from change and deletion requests.
- Object. You can object to (i) our processing of some of your information based on our legitimate interests and (ii) receiving marketing messages from us after providing your express consent to receive them. In such cases, I will delete your personal information unless I have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.

- Complain. If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with the Information Commissioner www.ico.org.uk

How to Contact Me

For purposes of the GDPR, I, ADELE HOLMES, am the data controller of your personal information. If you have any questions or concerns, you may contact me adele.chiropody@btinternet.com. Alternately, you may mail me at:

Mrs. Adele Holmes
Cockermouth Chiropody/Podiatry Ltd,
20 Laithwaite Close
Cockermouth
CA13 0AQ