

# GDPR 2018 PRIVACY NOTICE

## Greenfields Osteopathic Practice



This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek 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.

**Greenfields Osteopathic Practice**, based at **22 Hotspur Street, Shrewsbury, SY1 2QB**, is pleased to provide the following information:

### 1. Who we are

Greenfields Osteopathic Practice diagnoses and treats health conditions. Treatments are carried out in accordance with the Institute of Osteopathy's patient charter <http://www.iosteopathy.org/osteopathy/the-patient-charter/>.

### 2. Personal Data

- a) For the purposes of providing treatment, Greenfields Osteopathic Practice may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow the osteopath 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 your treatment. As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners (e.g. GPs, consultants, surgeons and/or medical insurance companies). Where this is required we will always inform you first unless we are under a legal obligation to comply.
- b) For marketing purposes, Greenfields Osteopathic Practice may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.
- c) In making initial contact with the practice you consent to Greenfields Osteopathic Practice 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. Greenfields Osteopathic Practice may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us. Greenfields Osteopathic Practice does 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.
- d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, 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.
- e) Greenfields Osteopathic Practice's website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. wix.com (practice website host), cliniko.co.uk (online appointment booking) and google analytics (website statistics) use cookies to help Greenfields Osteopathic Practice to identify and track visitors and their website access preferences. Greenfields Osteopathic Practice website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the Greenfields Osteopathic Practice website.
- f) Greenfields Osteopathic Practice will only collect the information needed so that we can provide you with the services you require. The business does not sell or broker your data.

### 3. Legal basis for processing any personal data

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

### 4. Legitimate interests pursued by Greenfields Osteopathic Practice

To promote treatments for patients with all types of health problems indicated for osteopathic care.

### 5. Consent

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

### 6. Disclosure

Greenfields Osteopathic Practice will keep your personal information safe and secure. Only staff engaged in providing your treatment will

# GDPR 2018 PRIVACY NOTICE

## Greenfields Osteopathic Practice

have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Greenfields Osteopathic Practice will not disclose your Personal Information unless compelled 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.

### 7. Retention Policy

Greenfields Osteopathic Practice will process personal data during the duration of any treatment and will continue to store only the personal data needed for 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.

### 8. Data storage

Clinical and personal data related to osteopathic treatment at Greenfields Osteopathic Practice is stored by Cliniko, the provider of the practice's clinical data system. Cliniko are fully compliant with GDPR. Further information is available on request.

### 9. Your rights as a data subject

At any point whilst Greenfields Osteopathic Practice is in possession of, or processing your 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 for the data we hold about you to be erased from our records.
- Right to 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 transferred 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 or profiling.

In the event that an osteopath refuses your 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, Greenfields Osteopathic Practice can confirm what information it holds about you and how it is processed.

### 10. You can request the following information:

- Identity and the contact details of the person or organisation (Greenfields Osteopathic Practice) that has 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 Osteopaths 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: Information Commissioner's Office).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### 11. To access what personal data is held, identification will be required

Greenfields Osteopathic Practice 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 a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Greenfields Osteopathic Practice is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to [john@greenfieldsosteopathy.co.uk](mailto:john@greenfieldsosteopathy.co.uk) or by phoning 01743 350528 / (mobile) 07947 358294 or writing to us at the address further below.

### 12. Complaints

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

# GDPR 2018 PRIVACY NOTICE

## Greenfields Osteopathic Practice

The contact details are as follows:

**John Atyeo, Registered Osteopath, Greenfields Osteopathic Practice, 22 Hotspur Street, Shrewsbury, SY1 2QB**

Telephone 01743 350582 / (mobile) 07947 358294, or email: [john@greenfieldsosteopathy.co.uk](mailto:john@greenfieldsosteopathy.co.uk)

### ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>

### Document control

Version	Author	Review date	Content / changes
0.1	The Institute of Osteopathy	19/4/2018	GDPR 2018 Privacy Notice template for use by osteopathic practices in UK
1.0	John Atyeo, Registered Osteopath, Greenfields Osteopathic Practice	9/8/2018	Addition of Greenfields Osteopathic Practice details

Date of next review: 9/8/2019