

# EYRE STREET DENTAL PRIVACY POLICY

## INTRODUCTION

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal information is handled. During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

## DATA PROTECTION PRINCIPLES

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

## INFORMATION YOU GIVE TO US

We may collect, use, store and transfer different kinds of personal information about you, including:

- **Identity Data**, such as your name, username or similar identifier, marital status, title, date of birth, gender,
- **Contact Data**, such as your address, email address and telephone numbers,
- **Financial Data**, such as bank account and payment card details,

### 'SPECIAL CATEGORY' DATA

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.

During the course of dealing with you, we will only collect data relating to your ethnic origin.

### HOW WE COLLECT YOUR PERSONAL INFORMATION

We may obtain personal information by directly interacting with you, such as:

- corresponding with us by phone, email, letters or otherwise.

### HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We will only use 'special category' information:

- provided we have your explicit consent to use it,
- where we believe that we need to use that data to protect your vital interests where you are not able to provide us with your explicit consent,
- where it is necessary for reasons of substantial public interest,
- where you have previously made that data public knowledge, or
- if we need to use that data to establish, exercise or defence legal claims.

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL INFORMATION

To provide proper and safe dental care we may need to disclose personal information about you to:

- Your GP
- Other health care professionals who are caring for you eg: Laboratories, secondary care, referral services
- NHS payment authorities
- Inland Revenue
- Benefits agency if you have claimed exemption or remission from NHS charges
- Private dental schemes or dental payment schemes
- Agents and third parties as required by law

Disclosure will take place on a 'need-to-know' basis.

We will only use your personal information for the purpose(s) for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## WHAT IF YOU CANNOT OR WILL NOT PROVIDE US WITH YOUR PERSONAL INFORMATION

It is a contractual requirement for you to provide us with certain information, namely your name, address, date of birth. If you do not provide us with that information, we will be unable to treat you as a patient.

## COOKIE POLICY

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This

helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

#### DISCLOSURE OF YOUR INFORMATION

We may share your personal information with the parties set out below:

- providers of IT and system administration services to our business including NHS England, NHSBSA/Carestream
- our professional advisers (including solicitors, bankers, auditors and insurers)
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your personal information for specified purposes and in accordance with our instructions.

#### WHERE WE STORE YOUR PERSONAL INFORMATION

All information you provide to us is stored on our secure servers in the United Kingdom.

Carestream Dental  
Wiltron House  
Rutherford Close  
Stevenage  
SG1 2EF  
Tel: 01438 245000

& at Eyre Street Dental

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Building entry controls** (alarmed, locked building including windows)
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Firewalls.**
- **Encryption** (our website is encrypted using SSL)

- **Overseas transfers.** Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### WHAT PERSONAL INFORMATION DO WE HOLD

To provide patients with a high standard of dental care and attention, we need to hold their personal information. This personal data can include:

- Past and current medical and dental condition: personal details such as age, address, telephone number and general medical practitioner
- Radiographs, clinical photographs and study models
- Information about their treatment that we have provided or purpose and its cost
- Notes of conversations or incidents that might occur for which a record needs to be kept
- Records of consent to treatment
- Any correspondence relating to them and other health care professionals, for example in the hospital or Medical Specialist Group

### HOW LONG WE WILL STORE YOUR PERSONAL INFORMATION

We will retain your dental records while you are a practice patient and after you cease to be a patient, for at least eleven years, or for children until the age of 25, whichever is the longer.

### YOUR RIGHTS

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a **right to access the information** we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained

the information and for how long we will use your information. Parents may access their child's record if this is in the child's best interests and not contrary to a competent child's wishes. Formal applications for access must be in writing to the Practice Manager.

- You have the **right to ask us to rectify any information** we hold about you that is inaccurate or incomplete.
- You have the **right to ask us to erase the information** we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the **right to ask us to stop using your information** where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the **right to ask us to transmit the information** we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the **right to object to us using/storing your information**. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the **right to withdraw your consent** at any time.
- You have the **right to object to us using/storing your information for direct marketing purposes**.

If you wish to exercise any of your legal rights, please contact our Practice Manager by writing to the address at the top of this policy or by emailing us at [eyrestreetdental@talktalk.net](mailto:eyrestreetdental@talktalk.net)

You also have the right, at any time, to lodge a complaint with the Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

### AUTOMATED DECISION-MAKING

We do not use automated decision-making processes.

### CHANGES TO OUR POLICY

Any changes we make to our policy in the future will be posted on our website where appropriate. Please check our website frequently to see any updates or changes to our policy.

### CONTACT

Questions, comments and requests regarding this policy are welcomed and should be addressed to our Practice Manager by writing to the address at the top of this policy, or by emailing us at [info@eyrestreetdental.co.uk](mailto:info@eyrestreetdental.co.uk)