

# Privacy Policy Updated May 2018

Patient privacy is extremely important to us. Please find below details of how we collect, store and process your personal information. We have a legal obligation to process and hold information about our patients.

This policy has been updated in order to comply with the new General Data Protection Regulations (GDPR), which come into effect on 25<sup>th</sup> May 2018.

Joanne Wraight at Mid Suffolk Physiotherapy, 47a Bury Street, Stowmarket, IP14 1HD, is the Data Controller. Any enquires relating use of personal data or access to personal data should be addressed to the Data Controller named above.

By using our website you consent to this Privacy Policy. We are registered with the Information Commissioner's Office (ICO) in order to comply with the appropriate and safe processing of personal data.

## What is personal data?

Personal data is "any information relating to an identified or identifiable natural person ('data subject')"

## Reasons/purposes for processing information

We process personal information to enable us to provide health services to our patients, to maintain our accounts and records, promote our services and to support and manage our employees. The information that is collected and stored is used primarily to provide services to you, and to meet our contractual commitment to you.

# Type/classes of information processed

We process information relevant for the above reasons/purposes. This information may include:

- personal details such as addresses, telephone numbers, email addresses and date of birth
- lifestyle and social circumstances
- credit card information via Worldpay

#### Information we collect

We collect information from our website only if the information is supplied by the prospective patient, via our contact form, or via our online booking system. This will include the patient's name, date of birth, telephone number, address and email address. When using our online booking system, Cliniko, you will be asked if you consent to having your data stored outside of the EEA. The privacy policy for Cliniko is available to view when booking online and they are fully GDPR compliant.

## We also process sensitive classes of information that include

- physical or mental health details
- medial history and health status

## Who the information is processed about

We process personal information about our:

Patients

#### Where we store and where we may transfer your data

We use an online practice management software, Cliniko. This company is based outside of the European Economic Area EEA and you will be asked to consent to your data being stored outside of the EEA at first point of contact. This is often the case when data is stored online in what is referred to as 'the Cloud'. Our exercise software, Physiotec, is also based outside of the EEA. Again, you will be asked to consent that your name and email address are transferred to their systems. This is in accordance with GDPR and DPA.

#### Who the information may be shared with

We sometimes need to share the personal information we process with the individual themself and also with other organisations. Where this is necessary we are required to comply with all aspects of GDPR. Information would not be shared without the appropriate consent from the patient. What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons. We do not routinely send any marketing emails, but if this is something that is considered in the future, you have the right to decide to opt out of any such emails, and if you wish to do so please contact us at <a href="mailto:info@midsuffolkphysiotherapy.co.uk">info@midsuffolkphysiotherapy.co.uk</a>. There will also be an option to 'unsubscribe' to all emails.

## Where necessary or required we may share information with

- other healthcare professionals
- Physiotec- an exercise software company, in order to supply tailored exercise programmes (name and email address only- no health information)
- Mailchimp enables us to send out informative emails to patients with an option to unsubscribe at any time. This company also is fully compliant with GDPR and DPA and their privacy policy is available on their website.
- social and welfare organisations
- central government
- business associates
- family, associates and representatives of the person whose personal data we are processing
- suppliers and service providers (named above);
- current, past and prospective employers;

## <u>Security</u>

- Backups of our website are completed regularly, and the website is maintained to provide up to date information.
- Our computers are backed up regularly and have up to date firewall and anti-virus protection
- Emails received will be permanently deleted from our systems once dealt with and the enquiry/query has reached an end.
- Any emails sent to either yourself or a third party with personal or sensitive data will be appropriately encrypted or password protected in accordance with DPA and GDPR.

- We use cookies to gather information about numbers of visitors to our site and provide statistical data. This data does not contain any identifiable personal information.
- The clinic uses Worldpay to process credit card payments and is fully PCI DSS compliant

#### Your rights

- Under the new GDPR guidelines you have the right to access all information held about you.
   If you wish to have a copy of your notes then please contact us with a written request via email to <a href="mailto:info@midsuffolkphysiotherapy.co.uk">info@midsuffolkphysiotherapy.co.uk</a> or by post to Mid Suffolk Physiotherapy, 47a Bury Street, Stowmarket, IP14 1HD. Information will be released and provided to you within 1 month, in accordance with the new regulations. There will be no charge for this information
- We have a legal obligation to store your personal details including sensitive information, but you do have a right to request that your data is not used for any other purpose, such as marketing.

## Changes to this policy

Changes may be made at any time and will be available to you at all times, via our website, or in our clinic. We regularly review our privacy policies to ensure we are always up to date with changing legislation.

We welcome any comments you may have regarding our privacy policy. If you have any queries, please email Joanne Wraight on <a href="mailto:info@midsuffolkphysiotherapy.co.uk">info@midsuffolkphysiotherapy.co.uk</a> or write to Mid Suffolk Physiotherapy, 47a Bury Street, Stowmarket, IP14 1HD