



Patient Privacy Notice

Orthoderm is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, details of the information that Orthoderm may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully.

This Privacy Notice:

- Provides you with a detailed overview of how we will manage your data, from the point at which it is gathered and onwards;
- Will give you all the details you need on how we use your information, and how we will comply with the law in doing so;
- Sets out your rights in respect of your personal information, and how to exercise them. You can, for instance, seek access to your medical information, object to us using your information in particular ways and request rectification of any information which is inaccurate;
- We are also open to improvement; if you have any feedback on this notice, please contact our Data Protection Officer.

Data controller details

Orthoderm is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows:

Orthoderm Clinic
2 Ballynahinch Road
Hillsborough
Co Down
BT26 6AR
Tel: 028 9268 0940

Data protection principles

In relation to your personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way;
- Collect your data only for reasons that we find proper for the course of your healthcare/treatment in ways that have been explained to you;
- Only use it in the way that we have told you about;
- Ensure it is correct and up to date;
- Keep your data for only as long as we need it (in line with our retention schedule);
- Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed.

Types of data we process

Personal Data

Personal data is any information that is identifiable as belonging to you.

As a patient of Orthoderm, the personal information we hold about you may include the following:

- Your personal details including your name, title, address, date of birth, email address, phone numbers (including those of family members if supplied);
- Health & Care number;
- GP name and address;
- Private Health insurance company, account number and authorisation code;
- Background referral detail.

As our carpark is monitored by CCTV for the purpose of protecting staff and property, we may hold CCTV footage on you. We will only process personal data obtained by the CCTV system in a manner which ensures compliance with legislation.

Special Categories Personal Information

As a patient of Orthoderm, we will hold information relating to your medical treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. The special categories of personal information we hold about you may include the following:

- Details of healthcare you have received from us;
- Details of your current or former physical or mental health. This may include information about any healthcare you have received (both from Orthoderm directly and other healthcare providers such as GPs, hospitals – this may include private and/or NHS treatment) or need, including information about clinic and hospital visits and medicines administered.

How we collect your data

Information may be collected directly from you when you:

- Contact Orthoderm to make an appointment for healthcare services;
- Use Orthoderm's services;
- Complete enquiry forms on the Orthoderm website;
- Submit a query to us including through our website, by email or by social media;
- Correspond with us by letter, email, telephone or social media, including where you reference Orthoderm in a public social media post.

We may also collect personal information from other third party sources including, but not limited to:

- General Practitioners;
- Local NHS Trusts;
- Clinicians (including their medical secretaries);
- Your insurance policy provider.

Why we process your data

The law on data protection allows us to process your data for certain reason only:

- In order to perform a contract that we are party to;
- In order for us to carry out our legitimate business interests;
- To protect your interests;
- In order to carry out legally required duties; and
- Where something is done on the public interest.

All of the processing carried out by Orthoderm falls into one of the permitted reasons. For example we need to collect your personal data:

- To provide you with healthcare and related services;
- To communicate with any other individual that you ask us to update about your care and updating other healthcare professionals about your care;
- For account settlement purposes – to ensure your account and billing is accurate and up to date and for processing payments;
- To carry out clinical audit – to assess outcomes and identify improvements;
- Communicating with you and resolving any queries or concerns you may have;
- To comply with our legal or regulatory obligations and defend or exercise our legal rights.

Sharing your data

Your data may be shared with the following third parties (as appropriate):

- Healthcare professionals involved in your treatment (including their medical secretaries);
- Other members of our clinic support staff involved in the delivery of your care eg medical secretaries, receptionist;
- Local NHS trusts;
- Your General Practitioner;
- Anyone that you have asked us to communicate with eg carer/relative;
- Other organisations involved in the provision of care to you eg diagnostic and treatment centres, laboratories;
- Insurance companies who assist in the administration of your healthcare;
- Regulation and Quality Improvement Authority (RQIA);
- The police and other third parties where reasonably necessary for the prevention or detection of crime;
- Debt collection agencies.

We may also share your data with third parties to comply with a legal obligation upon us.

We may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

Orthoderm does not transfer personal data to any recipients outside of the EEA.

How long we keep your personal data for

In line with data protection principles, we will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with our legal and regulatory obligations.

If you would like further information regarding the periods for which your personal information will be stored, please contact our Data Protection Officer.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **The right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this Privacy Notice;
- **The right of access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request by writing to us at the address noted below. We will aim to respond to any request received from you within one month from your request, although this may be extended in some circumstances in line with Data Protection laws. Access to your data will usually be provided free of charge, although in certain circumstances we may make a small charge where we are entitled to do so under the Data Protection laws.
- **The right for any inaccuracies to be corrected.** If any data that we hold about you is incomplete or inaccurate, you are able to ask us to correct it;
- **The right to erasure** (also known as the right to be forgotten). If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it. However, there may be legal or regulatory reasons why we need to keep or use your information;
- **The right to restrict the processing of the data.** For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct. However, we do not have to comply with all requests to restrict our use of your personal information. In particular, for example, we do not have to comply with your request if the information is necessary to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercising or defending legal claims;
- **The right to portability.** You may transfer the data that we hold on you for your own purposes across different services. The information must be transferred in an electronic format;
- **The right to object to the inclusion of any information.** You have the right to object to the way we use your data where we are using it for our legitimate interests;
- **The right to regulate any automated decision-making and profiling of personal data.** Patients who attend our clinic will not be evaluated on the basis of automated processing nor is any decision making automated.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us

consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the above, please write to:

Data Protection Officer
Orthoderm Clinic
2 Ballynahinch Road
Hillsborough
BT26 6AR

Making a complaint

The supervisory authority in the UK for data protection is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.