



## Privacy Notice

The practice aims to meet the requirements of the Data Protection Act 2018, the United Kingdom General Data Protection Regulation (UK GDPR), the guidelines on the Information Commissioner's (ICO) website as well as our professional guidelines and requirements.

The data controller is the Practice Owner and also the Information Governance Lead is Graham Keeling.

You will be asked to provide personal information when joining the practice. The purpose of processing your personal data is to provide you with optimum dental health care and prevention.

The categories and examples of data we process are:

1. Personal data for the provision of dental health care
2. Personal data for the purposes of providing treatment plans, recall appointments, reminders or estimates
3. Personal data such as details of family members for the provision of health care to children or for emergency contact details
4. Personal data for the purposes of employed and self-employed team members employment and engagement respective
5. Personal data for the purposes of direct mail/email/text to inform you of important announcements or about new treatments or services
6. Personal data - IP addresses so that we can understand our patients better and inform our marketing approach as well as improve the web site experience
7. Special category data including health records for the purposes of the delivery of healthcare and meeting our legal obligations
8. Special category data including health records
9. Special category data to meet the requirements of the Equality Act 2010
10. Special category data details of criminal record checks for employees and contracted team members

We minimise the data that we keep, and do not keep it for longer than necessary.

We never pass your personal details to a third party unless we have a contract for them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or to secondary care such as a hospital, we will gain the individual's permission before the referral is made and the personal data is shared.

1. Personal data is stored in the UK or EU whether in digital or hard copy format
2. Personal data is obtained when a patient joins the practice, when a patient is referred to the practice

For full details or where your data is stored, please ask to see Information Governance Procedures.

We have established the following lawful bases for processing your data:

Our lawful bases for processing personal data:

1. The legitimate interests of the dental practice
2. Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
3. Consent of the data subject
4. To comply with our legal obligations

Our Article 9 conditions for processing special category data:

1. Processing is necessary for health care purposes
2. Processing necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained
3. We obtain consent of the data subject to process criminal record checks

The reasons we process the data include:

1. To maintain your contemporaneous clinical records
2. To provide you with dental treatment, prevention and oral health advice
3. To carry out financial transactions with you
4. To send your personal data to the General Dental Council or other authority as required by law
5. To communicate with you as and when required including appointment reminders, treatment plans, estimates and other communications about your treatment or the practice
6. To communicate with your next of kin in an emergency
7. If a parent or carer to communicate with you about the person you parent or care for
8. To refer you to other dentists or doctors and health professionals as required
9. To obtain criminal record disclosures for team members
10. For debt recovery
11. To continually improve the care and service you receive from us

The personal data we process includes:

Your name, address, gender, date of birth, NHS number, medical history, dental history, family medical history, family contact details, marital status, financial details for processing payment, your doctor's details and details of treatment at the practice. We may process more sensitive special category data including ethnicity, race, religion, or sexual orientation so that we can meet our obligations under the Equality Act 2010, or for example to modify treatment to suit your religion.

The retention period for special data in patient records is a minimum of 11 years and may be longer for complex records or to meet our legal requirements. The retention period for other personal data is 2 years after it was last processed. Details of retention periods are available in the Record Retention procedure available from the practice.

We obtain your personal details when you enquire about our care and service, when you join the practice, when you subscribe to our newsletter or register online, when you complete a registration or medical history form and when another practitioner refers you for treatment at our practice. Occasionally patients are referred to us from other official sources such as NHS clinics or hospitals.

You have the following personal data rights:

1. The right to be informed about the collection and use of your personal data

2. The right of access – to have a copy of the data we hold about you. Generally, we will not charge for this service
3. The right to rectification - to correct the data we have if it is inaccurate or incomplete
4. The right to deletion of your personal data (clinical records must be retained for a certain time period)
5. The right to restrict processing of your personal data
6. The right to data portability – to have your data transferred to someone else
7. The right to object to the processing of your personal data
8. Rights in relation to automated decision making and profiling

## **Privacy Notice for Children**

The practice keeps records of your name, address, date of birth and details of any health problems as well as details of your dental treatment and details about your family. We keep this information so that we can provide you with the best dental care. Your personal information is kept very confidentially and securely.

We only use your personal information so we can give you the best dental care and for sending reminders to you.

We only pass your personal information to another dentist, doctor or hospital if you have a problem that requires their special skills and you need to go and see them. We will not give your information to anyone else unless the law allows us to, or we have to provide it for legal reasons.

If you leave the practice, we will stop using your information, but will keep it confidentially and securely until you are 25 years old (or 26 years old if you were 17 when your last treatment ended), or for 11 years after the completion of treatment, whichever is longer.

We will then review if and when we can delete it. You can always ask for a copy of the information we hold for you, we can transfer it to another dentist or doctor at your request and you can ask us to stop using your personal information to send letters or contact you in other ways if you are no longer a patient at the practice.

When you reach 18 years of age the Privacy Notice about how we process your personal information will change to the adult version. A printed copy is available on request.