

## **WESSEX FOOT CLINIC PRIVACY POLICY / GDPR**

This Privacy Policy describes how and when we collect, use, and share information when you attend an appointment at our clinic, purchase a product from us, contact us, or otherwise use our services. This is to comply with the General Data Protection Regulations (GDPR) 2018.

### **Information We Collect**

To aid your treatment or as part of purchasing something from our business you will normally provide us with certain information, such as your name, email address, postal address, medical information and payment information. We will store your information on an electronic patient record and diary system which is fully password protected.

### **Why We Need Your Information and How We Use It**

We rely on a number of legal bases to collect, use, and share your information, including:

- where it is necessary for the purposes of the provision of health care as needed to provide our services, such as when we use your information to fulfil your podiatry assessment and treatment, or to provide customer support;
- when you have provided your affirmative consent, which you may revoke at any time, such as by signing up for our mailing list;
- if necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law.

### **Information Sharing and Disclosure**

Information about our patients/customers is important to our business. We share your personal information for extremely limited reasons and in limited circumstances, as follows:

- Medical professionals. With your consent we will share information with medical professionals such as your GP or consultant to allow continuity of care. You will receive a copy of any correspondence sent.
- Service providers. We engage certain trusted third parties to perform functions and provide services to our business, such as external reception services. We will share your personal information with these third parties, but only to the extent necessary to perform these services.
- Business transfers. If we sell or merge our business, we may disclose your information as part of that transaction, only to the extent permitted by law and with your knowledge.
- Compliance with laws. We may collect, use, retain, and share your information if we are legally required to.

### **Marketing (Email; Text; Mail; No Marketing options)**

From time to time we may need to contact you by email, text or phone to inform you of important information, for example, clinic closure due to inclement weather or sickness.

This type of contact is deemed to be part of reasonable business procedure. Occasionally, we may wish to send you direct marketing material which may include special offers for current clients, and newsletters. This is usually by email or text but may occasionally be by mail. If you are happy for us to do this or would prefer not to receive any marketing, please let us know your preferences at your first appointment.

## **Data Retention**

We retain your personal information only for as long as necessary to provide you with our services and as described in our Privacy Policy. However, we may also be required to retain this information to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements. The retention of podiatry records is normally a minimum of 8 years, after the last appointment. For customers who are not patients but may have bought products from our business we will keep any data you may have provided for a minimum of 6 years in line with tax legislation.

## **Transfers of Personal Information Outside the EU**

We may store and process your information through third-party hosting services in the US and other jurisdictions. For example, if using clinic software for patient notes and diary bookings. As a result, we may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If we are deemed to transfer information about you outside of the EU, we rely on Privacy Shield provided by the software provider as the legal basis for the transfer.

## **Your Rights**

You have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. We describe these rights below:

- **Access.** You have the right to access and receive a copy of the personal information we hold about you by contacting us using the contact information below.
- **Change, restrict, delete.** You may also have rights to change, restrict our use of, or delete your personal information. In the case of health records these are normally exempt from change and deletion requests.
- **Object.** You can object to (i) our processing of some of your information based on our legitimate interests and (ii) receiving marketing messages from us after providing your express consent to receive them. In such cases, we will delete your personal information unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- **Complain.** If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk)

## **How to Contact Me**

For purposes of the GDPR, I, Jacqueline Penrose, am the data controller of your personal information. If you have any questions or concerns, you may contact me on [Wessex-foot-clinic@outlook.com](mailto:Wessex-foot-clinic@outlook.com). Alternately, you may mail me at: Wessex Foot Clinic, 3 Station Road, Warminster, BA12 9BR.