



Redcliffe Dental Rooms

Occlusion Limited t/a Redcliffe Dental Rooms Privacy Notice

Policy

Redcliffe Dental Rooms aims to meet the requirements of; the Data Protection Act 2018, the General Data Protection Regulations (GDPR), the guidelines on the Information Commissioner's website, as well as our professional guidelines and requirements.

Scope

This Policy applies to all; registered clients, employees, self-employed practitioners and all partner organisations. This Policy will be revised to reflect any statutory adjustments.

Responsibility

Occlusion Limited, trading as Redcliffe Dental Rooms is a Data Controller registered with the Information Commissioner's Office (ICO). The Data Protection Officer is Clinic Manager & Information Governance Lead, Ian Donoghue.

This Privacy Notice is on display at Reception and a further copy can be made available by contacting either; 020 7603 2040 or by email at admin@redcliffedentalrooms.com.



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Data Categories and Data Management

You will be asked to provide personal information when registering with the Clinic for service, or when joining the clinic as an; employee, self-employed practitioner or partner organisation. The purpose of processing this data is to provide an optimum healthcare service.

The categories of data we process are:

- Personal data (team and partner organisations only) for the purposes of staff and self-employed practitioner management
- Personal data (registered clients only) for the purposes of direct mail/email/text marketing
- Special category data, including health records for the purposes of the delivery of health care to registered clients
- Special category data, including health records and details of criminal record checks, for managing team members and partner organisations

You will only be requested for data which is relevant to your; registration for; healthcare service, employment or other association with Redcliffe Dental Rooms.

We never pass your personal details to a third party, unless we have a contract in place, for them to process data on our behalf which maintains your confidentiality.

If we intend to refer a client to another practitioner or to secondary care such as a hospital, we will gain the client's permission before the referral is made and before personal data shared.

Opt-in and Opt-out

You have the right to determine your communication preferences, known under GDPR as either; Opt-in or Opt-out of communications. You have the right to change/amend your preferences at any time.



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Data Storage

- Personal data is stored in the EU whether in digital or hard copy format
- In circumstances where a partner organisation is located in the United States, personal data is stored and certified with the EU-US Privacy Shield
- Client personal data is obtained; when a client registers with the clinic, when a client is referred to the clinic or when a client subscribes for our services via our; website, call centre or email list
- Team, self-employed practitioner and partner organisation personal data is obtained during the recruitment process

Lawful Basis – GDPR, Articles 6 and 9

The lawful basis for processing special category data such as client and employee health data is:

- *Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional*

The lawful basis of processing personal data such as name, address, email or phone number is:

- Consent of the data subject (clients, team members, partner organisations)
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a potential contract
- Compliance with legal obligation or legitimate interest



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Data Retention

The retention period for special category data in patient/client records is a minimum of 10 years and may be longer for complex records in order to meet our legal requirements.

The retention period for staff records is 6 years.

The retention periods for other personal data is 2 years after it was last processed. Details of other retention periods are available in the Record Retention Procedure available from the clinic.

You have the following personal data rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (clinical records must be retained for a certain time period)
- The right to restrict processing
- The right to data portability
- The right to object



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Further Information

Further details of your rights can be seen in our Information Governance Procedures

Here are some practical examples of your rights:

- If you **are** a registered client of the clinic, you have the right to withdraw consent for important notifications, newsletters, surveys or marketing. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month.
- If you are **not** a registered client of the clinic, you have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text.

We have carried out a Privacy Impact Assessment and you can request a copy from the details below. The details of how we ensure security of personal data is in our Security Risk Assessment and Information Governance Procedures.

Comments, Suggestions and Complaints

Please contact Data Protection Officer, Ian Donoghue if you would like to; comment, offer suggestions or wish to complain about this Policy.



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Information Commissioner's Office (ICO)

If you are; unhappy with our response, if you require further advice or if you wish to make a complaint, you can contact the Information Commissioner's Office (ICO) on telephone number; 0303 123 1113 or via their website www.ico.org.uk.

The ICO can investigate your claim and take action against anyone who has misused personal data.