

# General Data Protection Regulation (GDPR) Privacy Notice

(Why we collect your personal data and what we do with it)

When you supply your personal details to us they are stored and processed for four reasons (the bits in bold are the relevant terms used in the General Data Protection Regulations – ie the law):

1. We need to collect personal information about your health in order to provide you with the best possible treatment. You requesting treatment and our agreement to provide that care constitutes a **contract**. You can, of course, refuse to provide the information, but if you were to do that we would not be able to provide treatment.
2. We have a “**Legitimate Interest**” in collecting that information, because without it we couldn’t do our job effectively and safely.
3. We also think that it is important that we can contact you in order to confirm your appointments with us, to update you on matters related to your medical care or check with you to see how you are. This again constitutes “**Legitimate Interest**”, but this time it is your legitimate interest.

We may also contact you if we need to change an appointment, inform you of a change of practitioner, to give you directions to the clinic or entry instructions or if there are other important changes.

4. Provided we have your **consent**, we may occasionally send you general health information in the form of articles, advice or newsletters. You may withdraw this consent at any time – just let us know by any convenient method. If you choose not to receive any such correspondence from us you will still receive correspondence which falls under “legitimate interest” as above.

We have a legal obligation to retain your records for 8 years after your most recent appointment (or age 25, if this is longer), but after this period you can ask us to delete your records if you wish.

Your records are stored:

- Electronically (“in the cloud”), using a specialist medical records service. This provider has given us their assurances that they are fully compliant with the General Data Protection Regulations. Access to this data is password protected, and the passwords are changed regularly.
- On paper, in lockable filing cabinets, and the offices are always locked out of working hours.
- On our office computers. These are password-protected, backed up regularly, and the offices are locked out of working hours.
- On portable devices (mobile phones and electronic tablets). These are password protected, backed up regularly and not left in the office overnight.

We will never share your data with anyone who does not need access without your written consent.

Only the following people/agencies will have routine access to your data:

- The medical records service who store and process our files (Cliniko.com, RehabMyPatient.com)
- Your practitioner(s) in order that they can provide you with treatment
- Our reception staff, because they organise our practitioners' diaries, and coordinate appointments and reminders

From time to time, we may have to employ consultants to perform tasks which might give them access to your personal data (but not your medical notes). We will ensure that they are fully aware that they must treat that information as confidential, and we will ensure that they sign a non-disclosure agreement.

You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. Provided the legal minimum period has elapsed, you can also ask us to erase your records.

We may ask you for ID before we release any such information.

We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

When we say "we" in this notice, we refer to Heavitree Osteopaths Exeter which is based at the following address:

5 North Street  
Heavitree  
Exeter EX1 2RH

Of course, if you feel that we are mishandling your personal data in some way, you have the right to complain.

Complaints need to be sent to what is referred to as the 'Data Controller'.

Here are the details you need for that:

**Mrs Pauline Goodall**  
**Heavitree Osteopaths Exeter**  
**5 North Street**  
**Heavitree**  
**Exeter EX1 2RH**

Telephone **+44 (0) 01392 273243**  
or email: **heavitreeosteopaths@gmail.com**

Legally, we have 30 days to reply to your complaint.

If you are not satisfied with our response, then you have the right to raise the matter with the Information Commissioner's Office.