

GDPR 2018 PRIVACY NOTICE

Scope

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

1 – Ripon Natural Health Centre (RNHC) is pleased to provide the following information:

2 - Who we are

RNHC offers Osteopathy, Acupuncture, Homeopathy, Massage therapies and Deep Memory Process Therapy as treatments and also provides training and educational courses in areas related to health and wellbeing such as meditation and martial arts.

3 - Personal Data

a) For the purposes of providing treatment, our practitioners may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. It is a condition of any treatment that you give your explicit consent to allow our practitioners to document and process your personal medical data. As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners e.g. GPs, consultants, surgeons and/or medical insurance companies. Where this is required we will always ask for specific consent unless we are under a legal obligation to comply.

b) Practitioners may occasionally also act on behalf of their patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us.

c) Contact details provided by you such as telephone numbers, email addresses and postal addresses may be used to contact you about your appointments and provide reports or other information concerning your treatment. Some patients choose to contact us or communicate by email and that works well but please be aware that our email is not encrypted.

d) RNHC website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WordPress.org uses cookies to help RNHC to identify and track visitors and their website access preferences. RNHC website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the website.

e) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

f) For marketing purposes, RNHC may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing you information which the practice believes may be of interest; for instance courses, training or workshops run by us. We will need your consent for us to contact you for this purpose and you can ask to be removed from our marketing database at any time.

g) We will only collect the information needed so that we can provide you with the services you require. RNHC does not sell or broker any personal data.

4 - Legal basis for processing any personal data

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

5 - Legitimate interests pursued by Practitioners

To promote treatments for patients.

6 – Consent

Through agreeing to this privacy notice you are consenting to RNHC processing your personal data for the purposes outlined. You can withdraw your consent for marketing at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.

7 – Disclosure

RNHC will keep your personal information safe and secure, only practitioners engaged in providing your treatment will have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Practitioners will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

GDPR 2018 PRIVACY NOTICE

8 - Retention Policy

RNHC will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

9 - Data storage

All Data is held in the United Kingdom. RNHC does not store personal data outside the EEA.

10 - Your rights as a data subject

At any point whilst RNHC is in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that RNHC refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request RNHC can confirm what information it holds about you and how it is processed.

11 - You can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of practitioners and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 - To access what personal data is held, identification will be required

RNHC will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If RNHC is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to Mark Young.

13 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by RNHC you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO. The details for each of these contacts are:

- **Mark Young, Ripon Natural Health Centre, 27 Market Place, Ripon HG4 1BN**
telephone +44 (0) 1765 601447 or email mark@riponnaturalhealth.co.uk
- **ICO, Wycliffe House, Water Lane, Wilmslow SK9 5AF**
telephone +44 (0) 303 123 1113 or email <https://ico.org.uk/global/contact-us/email/>

Thank you
Ripon Natural Health Centre

27 Market Place, RIPON HG4 1BN, www.riponnaturalhealth.co.uk, tel +44 (01) 1765 601447, enquiries@riponnaturalhealth.co.uk