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GDPR Privacy policy

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

Information I Collect

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

Why I Need Your Information and How I Use It

I 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 my services, such as when I 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 my 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.

My Commitment:

- I am committed to transparent, lawful, and fair proportionate processing of personal data. This includes all personal data I process about customers, or those who work or interact with me.
- *Privacy Notices* – I publish a privacy notice on my website and provide timely notices where this is required. I track and make available any changes in my privacy notice.
- *Breaches* - I consider personal data breach incidents and have a reporting mechanism so anyone involved is aware. I will assess whether we need to report breaches to the ICO as the Regulator of DPA. I take appropriate action to make data subjects aware if needed.
- *Information Rights* – I will process and manage subject access requests and other information rights requests.
- *Data Protection by Design and Default* - I have a procedure to assess processing of personal data is perceived to be high risk, that needs a Data Protection Impact Assessment (DPIA) carried out, and processes to assist staff in ensuring compliance and privacy by design is integral part to any product, project, or service I offer

- *Communications* - I have a clear communication plan which seeks to embed a culture of privacy and risk orientation.
- *Contracts* – I will ensure that my contracts are compliant with UK GDPR.

Marketing

From time to time, I may wish to send you direct marketing material which may include product offers and newsletters. If you are happy for me to do this, please indicate in what forms you would like to receive this information:

Mail Email Text Phone No Marketing

Information Sharing and Disclosure

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

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

Data Retention

I retain your personal information only for as long as necessary to provide you with my services and as described in my Privacy Policy. However, I may also be required to retain this information to comply with my legal and regulatory obligations, to resolve disputes, and to enforce my 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 my business I 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

I may store and process your information through third-party hosting services in the US and other jurisdictions. As a result, I may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If I am deemed to transfer information about you outside of the EU, I rely on Privacy Shield as the legal basis for the transfer, as X Cloud is Privacy Shield certified.

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. I describe these rights below:

- Access. You have the right to access and receive a copy of the personal information I hold about you by contacting me using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict my 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) my processing of some of your information based on my legitimate interests and (ii) receiving marketing messages from me after providing your express consent to receive them. In such cases, I will delete your personal information unless I 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 my use of your information (and without prejudice to any other rights you may have), you have the right to do so by contacting the Information Commissioner www.ico.org.uk

How to Contact Me

For purposes of the GDPR, I, Annia Modlinsky, am the data controller of your personal information. If you have any questions or concerns, you may contact me at the following email address quantumfootcare@gmail.com. Please use **GDPR request** in the subject line

Alternately, you may mail me at:

Studio 6, Ground Floor, Trafalgar House. 110 Manchester Road. Altrincham, WA14 1NU

