

Privacy Notice

(Created April 2018)



This notice explains what information we collect, when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

Who are we?

Allen Physiotherapy, Rehabilitation and Sports Medicine (APR) (“I” “we” or “me”/ “us”) take the issue of security and data protection very seriously and strictly adhere to guidelines published in the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number **Z7056536** and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Valerie Carcary.

Any questions relating to this notice and our privacy practices should be sent to Valerie Carcary at admin@physiosportsmed.co.uk.

How we collect information from you and what information we collect

We collect information about you:

- From your consent to treatment form
- From your consultations and treatments with us
- From information received from your other health providers, health insurance companies, sports coaches, and other agencies that are involved in your health and wellbeing.

We collect some or all of the following information about you:

- Name, e-mail address, telephone number, Date of Birth, address
- Doctors name, surgery name, surgery address, surgery telephone number
- Insurance company, insurance membership number, authorisation number
- Employment role, hobbies, sports activities, role of person who you were recommended to us by (eg. coach, friend etc.)
- Information about your injury or illness as provided during your treatments

- We may ask you to complete optional surveys in order to support us to improve our service provision. These can be completed anonymously.

Why we need this information about you and how it will be used

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract with you;
- to enable us to supply you with the services and information which you have requested;
- to help you to manage and/or recover from your injury or illness;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our business or supplies which may affect you;
- for all other purposes consistent with the proper performance of our operations and business;
- to provide you with information and newsletters about the physiotherapy practice.

Sharing of Your Information

The information you provide to us will be treated as confidential. We do not pass your information to third parties for marketing purposes.

We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- To liaise with other professionals involved in your care and wellbeing including, but not exclusively, your doctor, consultant, coach;
- To liaise with your insurance company about your treatments and payment for your treatments;
- To ensure any physiotherapist or hydro therapist working within APR has the relevant information to ensure the best treatment for you;
- To provide custom made orthotics;
- To provide you with updates and / or newsletters from the physiotherapy practice;
- If you are unable to make payments for your treatments, your information may be disclosed to any relevant party assisting in the recovery of this debt or the tracing of you in order to recover this debt.

Your information is uploaded to tools used for the effective management of the practice. The tool we use is:

- Freehand Clinic Manager by Sensible People

The above organisation has confirmed that they do not process any of the data received as a result of our use of the systems. Data is stored on secure servers in two areas of the UK, and copies of backups are stored on a secure server in Germany. Our local computer drives are encrypted to secure any locally held data. Backups of these drives are stored in a datacentre in Reading.

Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Security

When you give us information we take steps to make sure that your personal information is kept secure and safe.

Your paper records are stored in locked rooms and cabinets in and behind the reception area outside opening hours. Cabinets and rooms are locked if staff are not present during working hours. Records for discharged patients are kept in locked cupboards in the practice.

Computer records on the Freehand Clinic Manager are stored in secure locations in the UK and Germany. Our local computer drives are encrypted to secure any locally held data. Backups of these drives are stored in a datacentre in Reading. _____

Notes may be transferred between the Guildford clinic and the Battersea clinic. They will be stored in secure document bags whilst between clinics and physiotherapists will follow our Secure Transportation Policy.

How long we will keep your information

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

We have a duty to keep your records for 8 years after you have been discharged, unless you were treated as a child in which case we have a duty to store your records until you turn 25 years old, or you were discharged more than 8 years ago, whichever is the later. Records for discharged patients are stored at the practice in locked cupboards.

We have a duty to retain your financial records for 6 years from the last transaction.

Paper records of patients who were discharged more than 8 years previously will be shredded. Shredding will take place on an annual basis by a dedicated, secure shredding service.

Electronic records will be archived 8 years after discharged. This will take place on an annual basis.

Your Rights

You have the right at any time to:

- ask for a copy of the information about you held by us in our records;
- require us to correct any inaccuracies in your information;
- make a request to us to delete what personal data of yours we hold (unless we are required to hold it for legal purposes for a certain period of time); and
- object to receiving any marketing communications from us.

If you would like to exercise any of your rights above please contact us at admin@physiosportsmed.co.uk

Should you wish to complain about the use of your information, we would ask that you contact us to resolve this matter in the first instance. You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

England:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
Telephone: 0303 123 1113
Email: casework@ico.org.uk

Scotland:

The Information Commissioner's Office
– Scotland
45 Melville Street, Edinburgh, EH3 7HL
Telephone: 0131 244 9001
Email: Scotland@ico.org.uk

Wales:

Information Commissioner's Office
2nd floor, Churchill House
Churchill way, Cardiff, CF10 2HH
Telephone: 029 2067 8400
Email: wales@ico.org.uk

Northern Ireland:

Information Commissioner's Office
3rd Floor, 14 Cromac Place
Belfast, BT7 2JB
Telephone: 028 9027 8757
Email: ni@ico.org.uk

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.