

## **PRIVACY POLICY for Horley and Crawley Spinal Health Clinics.**

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

When you supply your personal details to this clinic they are stored and processed for 4 reasons (the bits in bold are the relevant terms used in the Data Protection Act 2018, which includes the General Data Protection Regulation – i.e. the law):

1. We need to collect personal information about your health to provide you with the best possible treatment. Your 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 to confirm your appointments with us or to update you on matters related to your medical care. This again constitutes “Legitimate Interest”, but this time it is your legitimate interest.
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. 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. Otherwise, we will retain your records indefinitely in order that we can provide you with the best possible care should you need to see us at some future date.

Your records are stored:

- on paper, in locked filing cabinets, and the offices are always locked and alarmed out of working hours.

- 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 our office computers. These are password-protected, backed up regularly, and the offices are locked and alarmed out of working hours.

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
- 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 (but they do not have access to your medical history or sensitive personal information)
- Other administrative staff, such as our finance team. Again, administrative staff will not have access to your medical notes, just your essential contact details.

- We also use mailchimp to coordinate our messages, so your name and email address may be saved on their server. We also use this platform for marketing purposes (on you opt-ing in for this service).

#### Our Website

- Messages sent from our website: We will receive your personal data by email from our website. We do not store your personal details on our website. We may store your email on our email system, which is either Gmail or Microsoft, who are both GDPR compliant.
- Our website is located on a server in the UK, and all server and website backups are kept within the UK.

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 want you to be 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.

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 in the jargon as the “Data Controller”.

Here are the details you need for that:

**Philip Mitchell**

[info@chiropractic-uk.com](mailto:info@chiropractic-uk.com) or [clinic@horleyspinalhealth.co.uk](mailto:clinic@horleyspinalhealth.co.uk)

**West Sussex Chiropractic Clinic, 9 Southgate Parade, Crawley, RH10 6ER**

**Horley Spinal Health, 68 Victoria Road, Horley, RH6 7PZ**

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