



## **PATIENT DATA PRIVACY POLICY FOR MUNRO HALL CLINIC**

### **SUMMARY**

Munro Hall Clinic aims to meet the requirements of the Data Protection Act 2018 and takes great care to protect the personal data we hold for our patients in line with the requirements of the General Data Protection Regulation (GDPR), with effect from 25<sup>th</sup> May 2018.

The purpose of collecting and storing personal data about our patients is to ensure we can:

- Provide, appropriate, safe and effective dental care, treatment and advice for all our patients
- Fulfil any contracts we hold in relation to their care
- For business administration of their care.

### **PERSONAL DATA HELD FOR OUR PATIENTS**

The personal data we process (processing includes obtaining the information, using it, storing it, securing it, disclosing it, and destroying it) for our patients includes:

- Name, address, date of birth
- Email address
- Phone numbers
- GP & specialists contact details
- Occupation
- Marital Status & number of children
- Medical & Dental history
- Dental care records
- Photographs
- Family group
- Payment plan details
- Financial information
- Credit cards receipts
- Correspondence
- Details of any complaints received

We keep an inventory of personal data we hold on our patients and this is available for patients on request. A list of personal information held is also included in our Privacy No-tice that is given to all patients.

### **DISCLOSURE TO THIRD PARTIES**

The information we collect, and store will not be disclosed to anyone who does not need to see it.

We will share our patients' personal information with third parties when required by law or to enable us to deliver a service to them or where we have another legitimate reason for doing so. Third parties we may share patients' personal information with may include:

- Regulatory authorities such as the General Dental Council or the Care Quality Commission
- NHS Local Authorities
- Dental payment plan administrators
- Insurance companies
- Loss assessors
- Fraud prevention agencies
- In the event of a possible sale of the practice at some time in the future.

We may also share personal information where we consider it to be in a patient's best interest or if we have reason to believe an individual may be at risk of harm or abuse.



## **PERSONAL PRIVACY RIGHTS**

Under the GDPR all individuals who have personal information held about them have the following personal privacy rights:

- Right to subject access.
- Right to have inaccuracies deleted.
- Right to have information erased.
- Right to object to direct marketing.
- Right to restrict the processing of their information, including automated decision-making.
- Right to data portability.

Patients who wish to have inaccuracies deleted or to have information erased must speak to the dentist who provided or provides their care.

## **LEGAL BASIS FOR PROCESSING DATA HELD ABOUT PATIENTS**

The GDPR requires us to state the legal basis upon which we process all personal data for our patients and it requires us to inform our patients of the legal basis on which we process their personal data. This is clearly stated in our privacy notice that is given to all patients.

The legal bases for recording individual types of data such as name, address, email or phone number is recorded in our patient personal data inventory, which is available for all patients to see on request.

The legal basis on which we process personal information for our private patients, and our payment plan patients is for the purposes of the delivery of health care.

## **AUTOMATED DECISION MAKING**

All individuals who have personal data held about them have a right to object to their personal data being subjected to automated decision making.

Patients will always be asked to give specific, informed, and verifiable, opt in consent for any processes involving automated decision making.

## **CONSENT**

From 25<sup>th</sup> May 2018, Munro Hall Clinic will obtain specific, unambiguous opt in consent from all new patients to send them any direct marketing information, appointment reminders by email/telephone/text, details of appointment times, practice newsletters or industry developments, treatments and practice costs. This consent will be obtained through the completion of the relevant Munro Hall Clinic Registration forms.

We also obtain specific, unambiguous, opt in consent from our patients to take photos of their mouth and/or face for clinical, testimonial or advertising purposes, send X-rays and/or photos to other dental clinics or specialists for referrals (or any other clinical or legal purpose) that might rely on these, and any personal data being subjected to automated decision making. For a new patient, we obtain consent for these things when the patient first attends the practice. For an existing patient, we ask the patient for consent when they attend for their recall appointment or for a treatment appointment. We refresh this consent should a patient complete an updated medical & dental history form.

## **RETENTION PERIOD**

This practice retains dental records and study models while the patient is a patient of the practice and after they cease to be a patient, for at least eleven years, or for children until age 25, whichever is the longer.



## COMPLAINTS

All individuals who have personal data held about them have a right to complain. All complaints concerning personal data should be made in person or in writing to Bitá Fox. All complaints will be dealt with in line with the practice complaints policy and procedures.

## TRANSFERRING PERSONAL DATA OUTSIDE THE EU

Patients' personal data is not transferred outside the EU unless specifically requested by the patient themselves in writing.

This Policy was reviewed and implemented on: 24<sup>th</sup> May 2018

This policy and relevant procedures will be reviewed annually and are due for review on: 23<sup>rd</sup> May 2019 or prior to this date in accordance with new guidance or legislative changes.

## ONLINE PRIVACY

Our website uses Google Analytics to help analyse how users navigate the site. The tool uses "cookies," which are text files placed on your computer, to collect standard Internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source

## WITHDRAWAL OF CONSENT

Patients have a right to withdraw their consent at any time. Patients are advised of their right to withdraw their consent for anything they wish to withdraw from in our privacy notice.

## DOCUMENT CHANGE RECORD FOR PATIENT DATA PRIVACY POLICY

The table below is used to register all changes to this policy:

<b>Published Date</b>	<b>Version</b>	<b>Pages affected</b>	<b>Description of revision</b>	<b>Author</b>
24/05/2018	1	All	Policy implemented	Bitá Fox