

BACKGROUND:

Solihull Wellbeing Chiropractic understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our patients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About The Data Controller

Emma Bryce, Business Owner

Registered address: Solihull Wellbeing Chiropractic, Fernhill Road, Solihull, B92 7RU.
Contact number: 07950 200198

Emma is registered with the General Chiropractic Council (GCC no. 03922) and a member of the McTimoney Chiropractic Association (MCA)

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that I use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 1.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 1 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have, provided the legal minimum period has elapsed. Please contact us using the details in Part 1 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.

- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, or we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 1.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

We want you to be absolutely 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 the "Data Controller" listed in Part 1.

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

5. What Personal Data Do You Collect?

We may collect some or all of the following personal data:

- Name
- Date of birth
- Contact details - postal address, email address and telephone number
- Occupation
- GP information
- Information about your presenting condition
- Medical and social information
- Payment information

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Communicating with you about appointments you may have, or wish to have. This may include responding to emails, texts or calls from you.
- Communicating with you to collect initial data/health screen ahead of your first appointment, and track your recovery afterwards.

7. How Long Will You Keep My Personal Data?

We are required by law to safely keep your patient record for a period of 8 years after your last visit (or in the case of a child, until his or her 25th birthday).

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

Your records are stored:

- on paper, in locked filing cabinets, and the offices are always locked 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 GDPR. 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 office(s) are locked out of working hours.

9. Do You Share My Personal Data?

We will never share your data with anyone who does not need access without your written consent, subject to exceptions whereby we are bound by law. For example, in some limited circumstances we may be legally required to share certain personal data (which might include yours) if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Only the following people/agencies will have routine access to your data:

- The secure 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 bookkeeper. Again, administrative staff will not have access to your medical notes

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.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 1.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within a period of one month of

receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available on request.