

## Patient Privacy Notice

We collect and use patient information under **Data Protection Act 2018** and **General Data Protection Regulations May 2018**

**In providing your dental care and treatment, we will ask for information about you and your health. Occasionally, we may receive information from other providers who have been involved in providing your care**

**This privacy notice describes the type of personal information we hold, why we hold it and what we do with it.**

### What personal data do we hold?

In order to provide you with a high standard of dental care and attention, we need to hold personal information about you. This personal data comprises:

- Personal details such as your name, age, address, telephone numbers, email address, next of kin, emergency contact details and your general medical practitioner;
- Your past and current medical and dental condition;
- Radiographs, clinical photographs and study models;
- Information about the treatment we have provided or propose to provide (and its cost and your proof of payment (card receipts and record in cash book) ;
- Notes of conversations or incidents that might occur for which a record needs to be kept;
- Records of consent to treatment;
- Notes of conversations with you about your care
- Any correspondence (relating to you) with other healthcare professionals: such as referrals to specialists, for example.

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- You have made a complaint or enquiry to us.
- You have made an information request to us.
- You wish to receive a service or have previously received a service from us.
- You subscribe to our e-newsletter?
- You have applied for a job or secondment with us.
- You are representing your organisation.

We also receive personal information indirectly, in the following scenarios:

- An employee of ours gives your contact details as an emergency contact or a referee.
- A patient of ours gives your contact details as an emergency contact.

### Why do we hold information about you?

We need to keep comprehensive and accurate personal data about our patients in order to provide them with safe and appropriate dental care.



### Retaining information

At Urchfont Dental Care we have a legal obligation to process and retain your personal and sensitive data. This includes data that can be used to identify you (for example: your name, date of birth and address) as well as sensitive medical and dental information (for example medication you are taking or dental treatment you have undergone). We have a legitimate interest to retain your data for 30 years.

### Keeping your information Safe

We store your personal information securely on our practice computer system and (in the case of records such as X-ray scan) in a manual filing system. Your information cannot be accessed by those who do not work at the practice; only those working at the practice have access to your information. They understand their legal responsibility to maintain confidentiality and follow practice procedures to ensure this.

### Lawful basis for processing your data and when it may be disclosed to a third party:

At Urchfont Dental Care we will only disclose your data with your consent unless under legal obligation.

In certain circumstances we may be required to disclose your information to a third party without your consent. These scenarios are:

- When disclosure is in the public interest: There are some circumstances where the wider public interest outweighs your right to confidentiality. For example where disclosure of your information would prevent a serious future risk to the public or assist in the prevention or prosecution of a serious crime
- If we are required to disclose the information by court order
- For legal reasons (if a legal claim has been brought against the dentist or patient) for example disclosure to a solicitor, court or debt collecting agency
- If the dentist needs advice from their insurers/defence organisation/legal representatives in the event that a patient makes a complaint / legal process against the dentist.

In certain circumstances we may be required to disclose your information to a third party, but only if we have your consent. These scenarios are:

- Referral letters to hospitals or specialists for dental treatment – only sent with your consent.
- Discussion with hospital consultants or GPs to confirm medical treatment or medication before we undertake any dental treatment – only discussed with your consent.
- If requested we may be required to disclose information to the Local authority or similar body in order to provide health care and for the functioning of the NHS- only disclosed with your consent

### Subject Access Requests

At Urchfont Dental Care we comply with the GDPR regulations on subject access requests. These requests allow you to see a copy of the information that Urchfont Dental Care holds about you. Subject access provides you with a right to see the information contained in personal data, rather than a right to see the documents that include that information.

An individual who makes a written request is entitled to be:

- told whether any personal data is being processed;
- given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- given a copy of the information comprising the data; and given details of the source of the data (where this is available).

We may refuse your subject access request if your data includes information about another individual, except where:

- the other individual has agreed to the disclosure, or
- it is reasonable to provide you with this information without the other individual's consent.

In deciding this, we will have to balance your right to access your data against the other individual's rights regarding their own information.

We can also refuse your request if it is 'manifestly unfounded or excessive'.

In accordance with the GDPR regulations, at Urchfont Dental Care it is our policy to respond to a subject access request promptly (we do not charge a fee for subject access requests) within 1 month of receiving it.

### Data Portability

At Urchfont Dental Care we offer Data Portability – this allows you to obtain and reuse your data for your own purposes across different services.

Data portability only applies:

- To personal data that you have provided to Urchfont Dental Care yourself (for example medical history or contact details. It does not include clinical notes or radiographs or photographs taken by the dentists at the practice).
- Where you have requested and consented for to us to process your data
- For the performance of a contract
- Only if the processing is carried out by automated means.

At Urchfont Dental Care – in accordance with the new GDPR guidelines – we will provide the personal data that is requested in a structured, commonly used and machine readable form (for example CSV files). We will provide the information free of charge.

All requests need to be given in writing and will be completed within one month of the request.

If you request it, and it is technically feasible we will transmit the data directly to another organisation of your request.

We will only process/ transmit data under our data portability policy with full written consent from you (the patient /or parent or guardian of the patient

If you have any concerns regarding how Urchfont Dental Care is processing your personal data you can contact the Information Commissioners Office on 0303 123 1113. Or visit their website at <https://ico.org.uk/concerns/>

### **Your right to object and withdraw consent**

In certain circumstances, you have the right to object to the processing of your personal data, and always if that processing involves direct marketing. If you have given consent for us to process or disclose your data, you have the right to withdraw this consent at any time by contacting the Practice Manager.

### **Your right to be forgotten**

In certain circumstances, you may be able to request to have your personal data erased, or object to the processing of your personal data.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact the Practice Owner (Dr Gwynnifer Henning) or the Practice Manager (Lyndall Henning) on:

Urchfont Dental Care,  
High Street  
Urchfont  
SN10 4QH  
TEL: 01380 840 726  
Email: [enquiries@urchfontdentalcare.co.uk](mailto:enquiries@urchfontdentalcare.co.uk)

Our Data Protection Officer is Jeremy Shatford. You can contact him at [dpo@jeremyshatford.co.uk](mailto:dpo@jeremyshatford.co.uk) or via our postal address above. Please mark the envelope 'Data Protection Officer'.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

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