Privacy Notice

The practice aims to meet the requirements of the Data Protection Act 2018, the United Kingdom General Data Protection Regulation (UK GDPR), the guidelines on the Information Commissioner's (ICO) website as well as our professional guidelines and requirements.

The data controller is Dr Michael Norton, the Information Governance Lead is Sarah Coles

This Privacy Notice is available on the practice website at www.nortonimplants.com at reception/ by email if you contact manager@nortonimplants.com/ by calling 0207 4869229.

You will be asked to provide personal information when joining the practice. The purpose of processing your personal data is to provide you with optimum dental health care and prevention.

The categories and examples of data we process are:

- Personal data for the provision of dental health care
- Personal data for the purposes of providing treatment plans, recall appointments, reminders or estimates
- Personal data such as details of family members for the provision of health care to children or for emergency contact details
- Personal data for the purposes of employed and self-employed team members employment and engagement respective
- Personal data for the purposes of [direct mail/email/text/other] to inform you of important announcements or about new treatments or services
- Personal data - IP addresses so that we can understand our patients better and inform our marketing approach as well as improve the web site experience
- Special category data including health records for the purposes of the delivery of health care and meeting our legal obligations
- Special category data including health records
- Special category data to meet the requirements of the Equality Act 2010
- Special category data details of criminal record checks for employees and contracted team members

We minimise the data that we keep, and do not keep it for longer than necessary.

We never pass your personal details to a third party unless we have a contract for them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or to secondary care such as a hospital, we will gain the individual's permission before the referral is made and the personal data is shared. Your data will be shared with the NHS if you are having NHS treatment.

- Personal data is stored in the [UK or EU] whether in digital or hard copy format

- Personal data is stored outside of the UK and/or EU in digital format when suitable safeguards have been put in place to allow personal data to be transferred

- Personal data is obtained when a patient joins the practice, when a patient is referred to the practice and when a patient subscribes to an email list

For full details or where your data is stored, please ask to see Information Governance Procedures (M 217C).

We have established the following lawful bases for processing your data:

Our lawful bases for processing personal data:

- [The legitimate interests of the dental practice
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Consent of the data subject
- To comply with our legal obligations
- Other]

Our Article 9 conditions for processing special category data:

- [Processing is necessary for health care purposes
- Processing necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained
- We obtain consent of the data subject to process criminal record checks
- Other]

The reasons we process the data include:

- To maintain your contemporaneous clinical records
- To provide you with dental treatment, prevention and oral health advice
- To carry out financial transactions with you
- [To manage your NHS dental care treatment]
- To send your personal data to the General Dental Council or other authority as required by law
- To communicate with you as and when required including appointment reminders, treatment plans, estimates and other communications about your treatment or the practice
- To communicate with your next of kin in an emergency
- If a parent or carer to communicate with you about the person you parent or care for
- To refer you to other dentists or doctors and health professionals as required
- To obtain criminal record disclosures for team members
- For debt recovery
- To continually improve the care and service you receive from us

The personal data we process includes:

Your name, address, gender, date of birth, NHS number, medical history, dental history, family medical history, family contact details, marital status financial details for processing payment, your doctor's details and details of treatment at the practice. We may process more sensitive special category data including ethnicity, race, religion, or sexual orientation so that we can meet our obligations under the Equality Act 2010, or for example to modify treatment to suit your religion [and to meet NHS obligations].

The retention period for special data in patient records is a minimum of 11 years and may be longer for complex records or to meet our legal requirements. The retention period for other personal data is 2 years after it was last processed. Details of retention periods are available in the Record Retention (M 215) procedure available from the practice.

We obtain your personal details when you enquire about our care and service, when you join the practice, when you subscribe to our newsletter or register online, when you complete a registration or medical history form and when another practitioner refers you for treatment at our practice. Occasionally patients are referred to us from other official sources such as NHS clinics or hospitals.

You have the following personal data rights:

- The right to be informed about the collection and use of your personal data
- The right of access – to have a copy of the data we hold about you. Generally, we will not charge for this service
- The right to rectification - to correct the data we have if it is inaccurate or incomplete
- The right to deletion of your personal data (clinical records must be retained for a certain time period)
- The right to restrict processing of your personal data
- The right to data portability – to have your data transferred to someone else
- The right to object to the processing of your personal data
- Rights in relation to automated decision making and profiling

Further details of these rights can be seen in our Information Governance Procedures (M 217C) or at the Information Commissioner's website. Here are some practical examples of your rights:

- If you **are** a patient of the practice you have the right to withdraw consent for important notifications, newsletters, surveys or marketing. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month

- If you are **not** a patient of the practice you have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text

We have carried out a Privacy Impact Assessment in Sensitive Information Map, PIA and Risk Assessment (M 217Q) and you can request a copy from the details below. The details of how we ensure security of personal data is in our Security Risk Assessment (M 217M) and Information Governance Procedures (M 217C).

Comments, suggestions and complaints
Please contact the IG Lead at the practice for a comment, suggestion or a complaint about your data processing at manager@nortonimplants.com, or 020 7486 9229 or by writing to or visiting the practice at 104 Harley Street, London, London, W1G 7JD. We take complaints very seriously.

If you are unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113, you can also chat online with an advisor. The ICO can investigate your claim and take action against anyone who's misused personal data. You can also visit their website for information on how to make a data protection complaint.

Related practice procedures
You can also use these contact details to request copies of the following practice policies or procedures:

- Data Protection and Information Security Policy (M 233-DPT), Consent Policy (M 233-CNS)
- Sensitive Information Map, PIA and Risk Assessment (M 217Q), Information Governance Procedures (M 217C), Record Retention (M 215)

If you have an enquiry or a request, please contact the Information Governance Lead: Sarah Coles
Norton Implants Ltd,
Email: manager@nortonimplants.com,
Phone: 020 7486 9229.

Thank you.