

ANRC Physiotherapy Clinic
PRIVACY POLICY

Introduction

This statement explains the processing and use of data collected by ANRC Physiotherapy Clinic including sensitive data.

ANRC Physiotherapy Clinic is committed to protecting and respecting the privacy of its patients, employees and sub-contractors, providers and suppliers and anyone associated to The Physiotherapy Centre.

All Personal, Sensitive and other data you provide to us will be processed by us in accordance with the European Union's General Data Protection Regulation (GDPR; 679/2016)

Collection of data

We may process Personal and Sensitive data when you provide it to us

via:-Telephone contact
Website contact
Email contact
Face to face contact

Or by any other contact means

This may include:-

For patients eg

- a) Personal data - Name
Contact details
Demographic data
Records of consent
Payment and purchase details
Social and family activity/history as relevant
- b) Medical information as relevant
GP details

Any other necessary information

2. For employees

- Personal data - Name
Contact details
Demographic data
Next of Kin contacts and GP contacts
Health Declaration as relevant
CV
Previous employment references
Relevant PAYE information

Bank details
Relevant HR & CPD / training records
Any other information necessary to the position held

3. Subcontractors & Suppliers eg

- Name Business name
- Contact details
- Goods/Services supplied
- Payment/invoice records
- BACS details

Other information relevant to the business/service you are supplying

Lawful basis for processing Personal/Sensitive data

We may process Personal data where all or one of the following applies:-

- 1) Prior express consent has been given by the supplier of that data prior to the processing. If consent for the processing of personal/sensitive data relevant and necessary by law, to the services provided by ANRC Physiotherapy Clinic is refused then that service cannot be supplied by ANRC Physiotherapy Clinic to the client
- 2) If the processing is necessary to uphold a contract between ANRC Physiotherapy Clinic and the data supplier
- 3) If the processing required by applicable law for the purpose of providing the services of The Physiotherapy Centre
- 4) The processing is necessary to protect the vital interests and the data supplier
- 5) Where ANRC Physiotherapy Clinic has a valid legitimate interest in the processing of the data for the purpose of managing, operating or promoting ANRC Physiotherapy Clinic and that legitimate interest is not over-ridden by the interests, rights or freedoms for the data supplier.
- 6) For the purpose of Detection & Prevention of Crime including the prevention of fraud
- 7) Where processing is necessary for the establishment, exercise or defence of legal rights

Purposes for which ANRC Physiotherapy Clinic processes Personal/Sensitive Data

ANRC Physiotherapy Clinic may process Personal/Sensitive data for the following purposes with consent or when required by legitimate law.

Provision of services to you relating to services provided at The Physiotherapy Centre, including

- a) Assessment and treatment for MSK conditions, services and associated Healthcare providers

- b) Communication on your behalf and with your consent to other Medical or related and relevant Practitioners
- c) Communication with you via any means (including via email, telephone, text messages, social media, post or in person) information regarding your association with ANRC Physiotherapy Clinic and your treatment, news items and other relevant information.
- d) Financial management for individuals and companies and sales information
- e) Surveys – engaging with you for the purpose of obtaining your views on the service of The Physiotherapy Centre
- f) Security issues including records of your visits
- g) Investigations for detecting and preventing breaches of policy, terms and conditions and criminal offences in accordance with applicable law
- h) Establishing, exercising and defending legal rights
- i) Compliance with our legal and regulatory obligations under applicable law
- j) Improving our services and communication portals, identifying and correcting issues to such areas

Disclosure of Personal/Sensitive Data to 3rd Parties

ANRC Physiotherapy Clinic may disclose Personal/Sensitive data to other professionals/entities within the same company for legitimate reasons and in accordance with applicable law.

In addition we may disclose your Personal/Sensitive data to:-

- 1) Legal and regulatory authorities upon request or for the purpose of reporting any actual breach of law or regulation
- 2) Outside professional advisors (such as General Practitioners, Consultants, other Health Care Professional, Lawyers) subject to binding contractual obligations of confidentiality
- 3) Third party processors (such as payment service providers, solicitors, insurance companies)
- 4) Any relevant law enforcement agency or court for the purpose of prevention, investigation, detection or prosecution of criminal offenses or for the establishment, exercise or defence of legal rights
- 5) Any relevant party in the event that ANRC Physiotherapy Clinic business is sold, reorganised or put into dissolution or liquidation – Your data protection rights will still be subject to GDPR 679/2016 law in this event

Data Security

ANRC Physiotherapy Clinic implements appropriate technical and organisational security measures to protect your personal and sensitive data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access and other unlawful or unauthorised forms of processing in accordance with applicable law.

It is your responsibility that any data you send on to us by any method is sent securely as you feel is appropriate.

Data Accuracy

ANRC Physiotherapy Clinic takes every reasonable step to ensure that Personal/Sensitive data is

- a) Accurate
- b) Up to date
- c) Relevant
- d) Erased when not needed or inaccurate

Data Minimisation

ANRC Physiotherapy Clinic takes every reasonable step to limit the volume of Personal data to that which is relevant and legally necessary for the provision of the services provided at The Physiotherapy Centre

Data Retention

ANRC Physiotherapy Clinic takes every reasonable step to ensure that Personal/Sensitive data is only retained for as long as is required by applicable law relevant to the services provided at The Physiotherapy Centre.

Medical information and necessary/relevant personal data relating to that information has to, by law, be held for a minimum of 8 years or indefinitely if appropriate

Legal Rights of the Data Provider

Subject to applicable law you may have a number of rights regarding the processing of relevant Personal/Sensitive data help at ANRC Physiotherapy Clinic including:-

- a) The right not to provide your Personal or Sensitive data (however please note that we cannot provide you with the full benefit of the services of ANRC Physiotherapy Clinic without the data required for such purpose)
- b) The right to request access of copies of your relevant Personal/Sensitive data and information regarding the processing and disclosure of the relevant data
- c) The right to request rectification of any inaccuracies in your relevant data providing these inaccuracies are proven
- d) The right to request, within applicable law and on legitimate grounds
 - i) Erasure of your relevant data (please note medical (sensitive) data and all relevant data associated to this has to be held for 8 years)
 - ii) Restriction of processing of your relevant data

- e) The right to object on legitimate grounds to the processing of relevant personal data by us on your behalf within applicable law
- f) The right to have certain relevant data transferred to another processor
- g) The right to withdraw consent to process your relevant data (such withdrawal does not affect the lawfulness of any processing performed prior to the date on which we receive notice of withdrawal of consent)
- h) The right to lodge complaints within the Data Protection Authority regarding the processing by ANRC Physiotherapy Clinic of your relevant Personal/Sensitive data

To exercise one or more of these rights or ask a question about these rights or about the processing by ANRC Physiotherapy Clinic of your Personal/Sensitive data. Please contact ANRC Physiotherapy Clinic on 01342 537610

- We may require proof of identity before we can give effect to these rights
- Where your request requires ANRC Physiotherapy Clinic to instigate your request to establish additional facts, we will investigate promptly within 7 working days before deciding what action to take

Direct Marketing

We may process your Personal data to contact you with information regarding services that may be of interest to you via email, telephone, direct mail or other communication forms.

All communication will always be in compliance with the law.

You may unsubscribe at any time from any communication, promotional lists but we may continue to contact you to the extent necessary for the purpose of any medical reason