



# GDPR 2018 PRIVACY NOTICE

## Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than it's predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subject. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

## 1-Your Practice

Finchley Back Care Centre LTD based at 2 Cyprus Road, Finchley Central, London N3 3RY which hereafter for the purposes of this Privacy Notice will be referred to us as the: Chiropractors /Spinal Specialists/Osteomyologists /Massage Therapist is pleased to provide the following:

## 2-Who we are

The Chiropractors diagnose and treat health conditions. Treatments are carried out in accordance with General Chiropractic Council code of practice and standards of practice

[https://www.gcc-uk.org/UserFiles/Docs/COPSOP\\_2010.pdf](https://www.gcc-uk.org/UserFiles/Docs/COPSOP_2010.pdf)

Osteomyology treatments are carried out in accordance with The Association of Osteomyology Profession code of practice and standards of practice.

[file:///C:/Users/CMS%20letf/Downloads/TAOO\\_Code.pdf](file:///C:/Users/CMS%20letf/Downloads/TAOO_Code.pdf)

The practice also provides massage therapy.

## 3-Personal Data

- a) For the purpose of providing treatment, Finchley Back Care Centre may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who are all signed an integrity and confidentiality agreement. To be able to process your personal medical data. Contact details such as telephone numbers, emails addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment. As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatments, on-going care or medical diagnosis that will require the sharing of your

medical records with other health care practitioners e.g. GPs, radiographer ,surgeons and/or medical insurance companies.

Where this is required we will always inform you first unless we are under a legal obligation to comply.

- b) For marketing purposes ,Finchley Back Care Centre may also use the contact details provided by you to respond to your enquires, including making telephone contact and emailing information to you which the practice believes may be of interest to you .
- c) In making initial contact with the practice you consent to Finchley Back Care Centre maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. Finchley Back Care Centre may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not directly employed by us .Finchley Back Care Centre do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end this Privacy Notice.
- d) Some basic personal data may be collected about you from the marketing forms of our correspondence and phone call and details of your visit to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.
- e) Finchley Back Care Centre website uses cookies, which is storing of information that a website stores on a visitor`s browser provides to the website each time the visitors returns. Cookies help Finchley Back Care Centre identify and track visitors and their website access preferences .Finchley Back Care Centre website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Finchley Back Care Centre website.
- f) Finchley Back Care Centre will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

#### **4)- Legal basis for processing any personal data**

To meet our contractual obligations we have indentified that retaining information contained in patient records are covered by the legal basis of contract. Patient treatment records are covered by the legal basis of consent. Patient details for purpose of contact between the practice and the individual are covered by legitimate interest .Retaining non-patient enquiry data (typically via website form or telephone call/message) are covered by legitimate interest.

#### **5) -Legitimate interest pursued by Finchley Back Care Centre**

To promote treatments for patients will all types of health problems indicated for Chiropractic/Spinal Specialist/Osteomyology care.

**6)-** Through agreeing to this privacy notice you are consenting to Finchley Back Care Centre processing your personal data for the purpose outlined .You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice .

#### **7)- Disclosure**

Finchley Back Care Centre will keep your personal information safe and secure, only staff engaged in providing your treatment will have access to your patients` records, although our administration team will have access details so that they can make appointments and manage your account .Finchley Back Care Centre will not disclose your Personal Information unless compelled to, in order to meet legal obligation, regulations or valid governmental requests. The practice may also enforce its Terms Conditions, including investigating potential violations of its Term and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of itself.

#### **8)- Retention Policy**

Finchley Back Care Centre will process personal data during the duration of any treatment and will continue to store only the personal data needed for 7 years after the contract expires to meet any legal obligations. After

seven years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you such as erasure details. Records concerning minors who have received treatment will be retained until child reached the age of 25

**The records shall be kept for at least 7 years following the last occasion on which treatment was given. In the case of treatment to minors, it is advisable that records should be kept for at least 7 years after they reach the age of majority**

#### **9) -Data Storage**

All Data is stored in the United Kingdom .Finchley Back Care Centre do not store personal data outside the EU

#### **10) -Your rights as data subject**

At any point whilst Finchley Back Care Centre is in process of, or processing your personal data, all subjects have the following rights:

- Right of access-you have the right to request a copy of the information that we hold about you
- Right of rectification-you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten-in certain circumstances you can ask for the data we hold about you to be erased from our record.
- Right to restriction of processing –where certain conditions apply you have a right to restrict the processing.
- Right of portability-you have the right to have the data we hold about you transferred to another organisation.
- Right to object-you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing including profiling-you also have the right not to be subject to the legal effects of automated processing or profiling

In the event that Finchley Back Care Centre refuse your request under right of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request, Finchley Back Care Centre can confirm what information it holds about you and how it is processed.

#### **11)-You can request the following information:**

- Identify and the contact details of the person or organisation (Chiropractors/Spinal Specialist/Osteomyologist) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis of processing.
- If the processing is based on the legitimate interest of Finchley Back Care Centre and information about these interest.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdrawn consent at any time.
- How to lodge a complaint with the supervisory at any time (ICO)
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obligated to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

### **12) – To access what personal data is held, identification required**

Finchley Back Care Centre will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving license, passport, birth certificate and utility bill not older than three months minimum of one piece of photographic ID listed above and a supporting document is required. If Finchley Back Care Centre is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to Zak Sharif on 0208 371 0222 or writing to us at the address further below.

### **13) - Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Finchley Back Care Centre you have the right to complain to us .If you do not get a response within 30 days, you can complain to the ICO.

The details for each of this contact are:

#### **Zak Sharif**

Telephone **0208 371 0222** or email **[info@fbpc.co.uk](mailto:info@fbpc.co.uk)**

#### **ICO**

Wycliffe House, Water Lane, Wimslow, SK9 5AF telephone +44 (0)303 123 1113

Or email: <https://ico.org.uk/global/contact-us/email/>