Vitruvian Dental Studio

# Privacy Notice

The practice aims to meet the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR], the guidelines on the Information Commissioner’s website as well as our professional guidelines and requirements.

The Information Governance Lead is James Nolan.

This Privacy Notice is available on the practice website at www.VDSLeeds.co.uk at reception/ by email if you contact contact@vitruviandentistry.co.uk

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 respectively

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 in England, Scotland and Wales or the HSC in Northern Ireland if you are having NHS or HSC treatment.

Personal data is stored in the EU whether in digital or hard copy format

Personal data is stored in the US in digital format when the data storage company is certified with the EU-US Privacy Shield

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.

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

Our lawful bases 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

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 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 10 years and may be longer for complex records or to meet our legal requirements. The retention period for staff records is 6 years. The retention periods for other personal data is 2 years after it was last processed. Details of retention periods are available in the Record Retention procedure.

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.

When accessing our website

*What are cookies?*

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology

For further information, visit allaboutcookies.org.

*How do we use cookies?*

Our Company uses cookies in a range of ways to improve your experience on our website, including:

* Keeping you signed in
* Understanding how you use our website

*What types of cookies do we use?*

There are a number of different types of cookies, however, our website uses:

* Functionality – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
* Advertising – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

*How to manage cookies?*

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

*Privacy policies of other websites*

The Vitruvian Dental Studio website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

*Changes to our privacy policy*

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 29/12/2020.

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 free copy of your data that we have

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 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 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 and Information Governance Procedures.

# Comments, suggestions and complaints

Please contact the IG lead at the practice for a comment, suggestion or a complaint about your data

processing at contact@vitruviandentistry.co.uk or by writing to or visiting the practice at Vitruvian Dental Studio, Unit 15, The Springs, Thorpe Park View, LS15 8GH. 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

Consent Policy

Privacy Impact Assessment

Information Governance Procedures Record Retention

If you have an enquiry or a request please contact the Information Governance Lead: James Nolan

Email: contact@vitruviandentistry.co.uk

Thank you.

Approved By: James Nolan

Date Published: 29/12/2020