

Ashburner Clinic Ltd takes the protection of your privacy very seriously. We will only use your personal information to enable us to deliver efficient service (and this includes: making appointments, providing confirmation and reminders of upcoming appointments and to communicate with you about your ongoing provision of services). From time to time we will also use your information to communicate with you about newly introduced services and to provide information on health-related issues, and any relevant products in the form of a newsletter or that you have requested from us, and to meet our legal responsibilities.

How do we collect information from you?

We obtain information about you when you engage us to deliver our services and when you use our website. This can be collected through meetings/appointments, telephone, written correspondence, or electronic communications.

What type of information do we collect from you?

The personal information we collect from you will vary depending on which services you engage us to deliver. The personal information we collect might include your name, address, telephone number, email address, which pages you may have visited on our website and when you accessed them.

When you visit our premises, our CCTV systems cover the inside of reception area of our office suite for the security of both clients and staff. These systems may record your image during your visit.

How is your information used?

Our legal basis for processing your information, in general terms, is contractual. Depending on which services you engage us to deliver, we may use your information to:

- contact you by post, email, or telephone
- verify your identity where this is required
- understand your needs and how they may be met
- maintain our records in accordance with applicable legal and regulatory obligations provide health-related advise and services
- prevent and detect crime, fraud, or corruption
- contact you with information that directly relates to our agreed services

With your consent, we may use your personal data to contact you with newsletters and services that may be of interest to you.

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity to law enforcement agencies.

We are required by legislation, other regulatory requirements, and our insurers to retain your data where we have ceased to act for you. The period of retention required varies with the applicable legislation but is typically six years plus the current year. To ensure compliance with all such

requirements it is the policy of the firm to retain this data for a period of seven years from the end of the period concerned.

Data Processing Addendum (DPA)

As part of the GDPR, to ensure our choice of processor does not prohibit us meeting GDPR requirements. With Cliniko, our practice management system, data is processed outside of the EU/EEA zone, so we need to go above and beyond when it comes to ensuring that your patient data is safe and sound with us.

To do that, we've signed a DPA. This DPA includes the Standard Contractual Clauses (also known as "Model Clauses"), which are an approved set of provisions that offer sufficient safeguards and protection for data that's processed outside of the EU/EEA.

To get legal for a minute, having signing the DPA makes Cliniko a viable choice for us in meeting GDPR requirements, as the DPA provides appropriate safeguards for the transfer of data outside of the EU/EEA, as mentioned in Article 46, 2) c) of the GDPR legislation.

Who has access to your information?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

Any staff with access to your information have a duty of confidentiality under the ethical standards that this firm is required to follow.

Osteopathy For Life, Balanced Nutrition For Life, PostureLab and Inline Biomechanics are trading names of Ashburner Clinic Ltd and each has access to your data where you have engaged their respective services. Each are controlled by the same people as Ashburner Clinic Ltd

We will share your information with your General Practitioner Service or other Health Professional only with your consent except in the case of any unforeseen life threatening emergency.

Our IT and software support providers may access information, with our permission, to assist with technical issues that prevent us providing our service to you.

External consultants and our regulatory body may have access to your information as part of periodic reviews to ensure we are maintaining our level of service to you.

Third Party Service Providers working on our behalf

We may pass your information to our third-party service providers, agents, subcontractors, and other associated organisations for the purposes of completing tasks and providing services to you on our behalf, for example to manage appointment bookings, and to deliver treatment services. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have confirmed that they will keep your information secure and not to use it for their own purposes.

Please be assured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention and detection of crime, fraud, or corruption.

How you can access and update your information

Keeping your information up to date and accurate is important to us. We commit to regularly review and correct where necessary, the information that we hold about you. If any of your information changes, please let us know using the 'Contact information' noted below.

You have the right to ask for a copy of the information Ashburner Clinic Ltd holds about you.

Security precautions in place to protect the loss, misuse, or alteration of your information

Whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will usually be processed in our offices in the UK. However, to allow us to operate efficient digital processes, we sometimes need to store information in servers located outside the UK, but within the European Economic Area (EEA). We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

Your choices

We may occasionally contact you by post/email/telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further. If you do not wish to receive such information from us, please let us know by contacting us as indicated under 'Contact information' below.

Your rights

Access to your information: You have the right to request a copy of the personal information about you that we hold.

Correcting your information: We want to make sure that your personal information is accurate, complete, and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Deletion of your information: You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained
- you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below
- our use of your personal information is contrary to law or our other legal obligations

Restricting how we may use your information: In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection

you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information, but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Objecting to how we may use your information: Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue. You have the right at any time to require us to stop using your personal information for direct marketing purposes.

Withdrawing consent to use your information: Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in 'Contact information' below if you wish to exercise any of these rights.

Changes to our privacy notice

We keep this privacy notice under regular review and will place any updates on our website. Paper copies of the privacy notice may also be obtained by contacting us.

This privacy notice was last updated in May 2018.

Contact information

Ashburner Clinic Ltd
The Wellness Suite
Epos House
Heage Road Industrial Estate
Heage Road
Ripley
Derbyshire
DE5 3GH

paul@osteopathy4life.com

Complaints

We seek to resolve directly all complaints about how we handle your personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745

Website: <https://ico.org.uk/concerns>