

Data protection policy

Keeping your records

This practice complies with the 1998 Data Protection Act and this policy describes our procedures for ensuring that personal information about patients is processed fairly and lawfully.

What personal data do we hold?

To provide you with a high standard of dental care and attention, we need to hold personal information about you. This personal data includes:

- Your past and current medical and dental condition; personal details such as your age, address, telephone number and your general medical practitioner
- Radiographs, clinical photographs and study models
- Information about the treatment that we have provided or propose to provide and its cost
- Notes of conversations/incidents about your care, for which a record needs to be kept
- Records of consent to treatment
- Correspondence relating to you with other health care professionals, for example in the hospital or community services.

The categories of data we process are:

- Personal data for the purposes of staff and self-employed team member management
- Personal data for the purposes of direct mail/email/text/other marketing
- Special category data including health records for the purposes of the delivery of health care
- Special category data including health records and details of criminal record checks for managing employees and contracted team members

The lawful basis for processing special category data such as patients' and employees' health data is:

- Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional

The lawful basis of processing personal data such as name, address, email or phone number is:

- Consent of the data subject
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

Why do we hold information about you?

We need to keep comprehensive and accurate personal data about our patients in order to provide them with safe and appropriate dental care. We will ask you yearly to update your medical history and contact details.

Retaining information

We will retain your dental records and orthodontic study models while you are a practice patient and after you cease to be a patient, for at least 11 years or for children until age 25, whichever is the longer. The retention period for staff records is 6 years.

Your lawful rights:

Under the [GDPR](#) you have a number of important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your use personal information.
- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address.
- Require us to correct any mistakes in your information which we hold.
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. **Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, we may no longer be able to provide care and support services to you.**
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations.
- Object at any time to processing of personal information concerning you for direct marketing.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
- Object in certain other situations to our continued processing of your personal information.
- Otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

Security of information

Personal data about you is held in the practice's computer system. The information is not accessible to the public; only authorised members of staff have access to it. They understand their legal responsibility to maintain confidentiality and follow practice procedures to ensure this. Our computer system has secure audit trails and we back up information routinely.

Disclosure of information

To provide proper and safe dental care, we may need to disclose personal information about you to:

- Your general medical practitioner
- Hospitals or community dental services
- Other health professionals caring for you
- The Inland Revenue
- Private dental schemes of which you are a member.
- Agents and Third parties as required by legal and law

Disclosure will take place on a 'need-to-know' basis, so that only those individuals/organisations who need to know in order to provide care to you and for the proper administration of Government

(whose personnel are covered by strict confidentiality rules) will be given the information. Only that information that the recipient needs to know will be disclosed.

In very limited circumstances or when required by law or a court order, personal data may have to be disclosed to a third party not connected with your health care. In all other situations, disclosure that is not covered by this Code of Practice will only occur when we have your specific consent. Where possible you will be informed of these requests for disclosure.

Access to your records

You have the right of access to the data that we hold about you and to receive a copy. Access may be obtained by making a request in writing. Parents may access their child's records if this is in the child's best interests and not contrary to a competent child's wishes. Formal applications for access must be in writing to The Practice Manager.

If you do not agree

If you do not wish personal data that we hold about you to be disclosed or used in the way that is described in this Code of Practice, please discuss the matter with your dentist. You have the right to object; however, this may affect our ability to provide you with dental care. If you have any concerns about how we use your information and you do not feel able to discuss it with your dentist or anyone at the practice, you should contact The Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (0303 123 1113 or 01625 545745).

You have a right to withdraw your consent at any time, however this will not be retrospective.

Date: 22/05/2018

Next Review date: 22/05/2019