



1 Wentworth House, Vernon Gate, Derby, DE1 1UR
Tel No: 01332 224820

WellBeing Clinics (UK) Ltd – PRIVACY POLICY *(Why we collect your personal data and what we do with it)*

*When you supply your personal details to this clinic they are stored and processed for 4 reasons (see **bold** for relevant terms used in the General Data Protection Regulation – i.e. the law).*

1. We need to collect personal information about your health in order to provide you with the best possible treatment. Your requesting treatment and our agreement to provide that care constitutes a **contract**. You can, of course, refuse to provide the information, but if you were to do that, we would not be able to provide treatment.
2. We have a "**Legitimate Interest**" in collecting that information, because without it we couldn't do our job effectively and safely.
3. We also think that it is important that we can contact you in order to confirm your appointments with us or to update you on matters related to your medical care. This again constitutes "**Legitimate Interest**", but this time it is your legitimate interest.
4. Provided we have your **consent**, we may occasionally send you general health information in the form of articles, advice or newsletters. You may withdraw this consent at any time – just let us know by any convenient method.

We have a **legal obligation** to retain your records for 8 years after your most recent appointment (or until the patient is age 26, if this is longer). After this period, your records will be deleted from our system and any hard copy records e.g. MRI scan discs, x-rays will also be securely destroyed. If you would like us to retain your information, you will need to request this in writing before the 8-year expiry date.

Your records are stored:

- On paper (records prior to April 2014) in locked storage, and the offices are always locked and alarmed out of working hours.
- Electronically on our in-house server, access to which is double password protected. All information is backed-up regularly and our offices are locked and alarmed out of working hours.
- In addition, our wireless network is secured by WPA2 Wireless Key Encryption and Individual Network Isolation and each user is completely isolated from other users on our network.

We never share your data with anyone who does not need access without your written consent. Only the following people/agencies will have routine access to your data:

- The Chiropractor(s) in order that they can provide you with treatment.
- Our reception/office staff because they organise our Chiropractors' diaries.
- For data security purposes, our practice management system backed-up at the end of every day and is held remotely. The software providers therefore hold your details on their server for the purpose of guarding against catastrophic system failure.
- From time to time we may have to employ IT consultants to perform tasks which might give them access to your personal data (but not your medical or treatment information). We will ensure that they are fully aware that they must treat your information as confidential, and we will ensure that they sign a non-disclosure agreement.

In addition, we may need to share your data with other third parties such as your GP, insurance company (if applicable) or another clinician whose opinion we may feel you would benefit from. Any decision to involve these individuals/organisations will always be made jointly with yourself and your consent to contact them will be sought.

You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. Provided the legal minimum period has elapsed, you can also ask us to erase your records.

We want you to absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

Of course, if you feel that we are mishandling your personal data in some way, you have the right to complain. Complaints need to be sent us here at this address:

The Clinic Manager, WellBeing Clinics (UK) Ltd, 1 Wentworth House, Vernon Gate, Derby. DE1 1UR.

If you are not satisfied with the response you get, you have the right to raise the matter with the Information Commissioner's Office.