



174 Manor Lane, Lee, SE12 8LP | [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk) | 020 8297 8887 | [www.chc-lee.co.uk](http://www.chc-lee.co.uk)

## **COMPLEMENTARY HEALTH CENTRE LEE (CHC) PRIVACY POLICY – 24 APRIL 2020**

The Complementary Health Centre Lee (CHC) is committed to protecting and respecting your privacy. We take your privacy very seriously and we ask that you read this Privacy Policy carefully as it contains important information on:

- The personal data we collect about you
- How we look after your personal data when you contact/ visit us via our website, by email, telephone or other media, or if you visit us at our Practice.
- With whom your personal data might be shared
- Your privacy rights and how the law protects you.

### **WHO WE ARE**

The CHC is a business/ complementary health centre based at 174 Manor Lane, Lee London, SE12 8LP. Our website address is [www.chc-lee.co.uk](http://www.chc-lee.co.uk).

This Privacy Policy is issued on behalf of the Complementary Health Centre (CHC), so when we mention “CHC”, “the Practice”, “we”, “us” or “our” in this Privacy Policy, we are referring to the business/ complementary health centre itself responsible for processing your personal data.

This Privacy Policy also makes reference to the term “CHC non-staff persons”. This is an overarching term for Practitioners, Therapists, Exercise Teachers, or others who normally rent space and services from CHC, or work from CHC. These non-staff persons are not employees of CHC. They are independent, self-employed practitioners with their own individual Professional Indemnity Insurance, with requirements by their insurance company and/or their professional bodies, associations or organisations regarding how they handle and process client or patient data.

The data they handle may be both personal data and special category data. Non-staff persons have their own data controller and data processor duties.

In certain circumstances, CHC non-staff persons may have access to, or be provided data held by CHC about their patients/clients/ students on a need to know basis. This may include, but is not exclusively confined to, your contact details (eg telephone number, email address) for the purpose of direct communication with you in relation to your treatment, care, health benefit, wellbeing, relaxation or consultations (face to face or remote).

CHC has no control whatsoever over how CHC non-staff persons process such data which they may use in their day to day practice, treatment and communications with you. Under no circumstances does CHC as a business / complementary health centre take any responsibility whatsoever for, nor accept any liability for any data breach or misuse thereto on the part of the CHC non-staff persons.

In such circumstances where we may share your data with CHC non-staff persons, these persons would have data processing and handling responsibilities and are required to be compliant with the Data Protection Act 2018, GDPR, CHC Data Privacy Policy and associated documents and legislation.

## PERSONAL DATA WHICH WE COLLECT

Personal data provided by you.

We collect personal data about you when you:

- Contact us through our website for whatever purposes
- Contact us in person, by email, telephone, social media or any other media for whatever purposes
- Register your details with us in any format
- Become a patient of the CHC by registering at the Practice
- Contact us by any means so as to apply or express interest in
  - working as a member of staff (eg receptionist)
  - working from CHC as an independent practitioners, therapists, or exercise teachers
  - any other matter
- Sign up to receive our newsletter or other emailed communications
- Complete any feedback (patient, staff, or other)
- Participate in courses or classes at CHC
- Communicate with us in any other way and in whatever capacity that may be

The personal data collected in the above manner may include, but may not exclusively be confined to, your:

- Full name
- Home and/ or postal address
- Date of birth
- Email address
- Telephone number
- Next of kin details
- Photograph or video
- Courses/ classes which you are interested in/book on and/or attend
- Business or professional name
- Business address
- Insurance details
- Professional training qualifications
- Details contained in any documents and/ or other media you submit to us (eg curriculum vitae or resume)

The lawful basis for the CHC collecting and processing your personal data is consent (eg if you have contacted or communicated with us electronically or in writing, including verbal or signed consent). This includes patient's registering at the practice via online booking, social media, email, or in person, and their data being stored on the CHC database. In certain circumstances the lawful basis for collecting and processing your data may be under legitimate interests, to help maintain and promote your health, wellbeing or relaxation. These circumstances may include, but is not exclusively confined to, emergency, national outbreak or relevant health promotion marketing.

Next of kin details are kept by CHC so as to ensure the safety of any patients at CHC in case of an emergency so that next of kin can be contacted. The lawful basis for this processing is consent of the patient and the next of kin (see later) and the condition of vital interests.

### **Patient Osteopath Notes**

CHC stores and handles Osteopath hand-held patient records. Essentially this means the Osteopath patient records are stored in a secure locked room which is in direct sight of, and which is handled only by, the CHC receptionist staff during all opening hours. The receptionists pull and hand over notes directly to the Osteopaths working from CHC who then are the data controllers and processors of those notes until returned to CHC for safe storage.

This type of data is both personal and special category data (health information).

CHC collects and processes the Osteopaths' patients' special category data (health information) with their consent (lawful processing requirement) under the conditions of consent and vital interests (condition requirement).

### **Other Practitioner's, Therapists or Teachers**

The CHC does not process any special category personal data for any other Patients or Practitioners/Therapists/ Teachers at CHC. Note that some other Practitioners choose to store their patient records at CHC in a locked cupboard/ cabinet but this is done so under those Practitioner/ Therapists' sole responsibility and they are responsible for keeping such information confidential and secure.

### **Personal data provided by third parties**

The CHC does not receive information about you from other sources apart from your practitioner, therapist or teacher. Any patient information stored on the CHC database is only accessed by CHC staff, owners, or relevant practitioners/therapists (latter with limited and need-to-know basis)

### **Personal data about other individuals**

If you give us information on behalf of someone else (such as your next of kin), you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- Give consent on his/her behalf to the processing of his/her personal data
- Receive on his/her behalf any data protection notices
- Give consent to transfer his/her personal data outside the European Economic area
- Give consent to the processing of their special category personal data (further details relating to special category personal data is detailed below).

## **HOW WE USE YOUR PERSONAL DATA**

Overview:

We collect information about you so that we can:

- Identify you and manage your interaction with our business in whatever capacity that may be (eg patient, staff member or practitioner)

- Manage your therapy, course or other bookings and ensure that we can provide you with a personalised experience
- Assist you with your queries in relation to our business / complementary health centre
- Review and process any of your information
- Conduct statistical analysis as required
- Notify you of any changes to our website or to our services that may affect you
- Improve our services
- Where relevant place information about you on our website (eg testimonials, articles) or multimedia such as newsletters (eg photos/articles) – with your consent.

The CHC does not perform any profiling or analysis of preferences of people.

In making contact with the Practice, you consent to us responding or communicating with you via your contact details. This may include providing information to you that we believe to be of interest or maintaining a marketing dialogue until you opt out (which you can do at anytime) or we desist in promoting our services.

CHC staff members will have access to your personal data and contact details so that they can fulfill their day-to day duties and responsibilities of their employment by us which includes, but is not exclusively, to make appointments, contact you and practitioners and teachers, manage your account and for marketing.

### **Remote Consultations**

Technology is available for remote consultations which may include telephone and video consultations and under some circumstances this may be appropriate for your care. The Complementary Health Centre in providing its services may facilitate remote consultations held by CHC non-staff persons (therapists, practitioners and class-teachers). This may include, but is not exclusively confined to, sharing your contact details (eg telephone number, email address) with CHC non-staff persons for the purpose of direct communication with you in relation to your treatment, care, health benefit, wellbeing, relaxation or consultations (both face-to-face and remote), and CHC facilitating these remote consultations by making and handling remote consultation appointment bookings on our booking system.

Under no circumstances does CHC as a business/ complementary health centre take any responsibility for, nor accept any liability whatsoever for any data breach thereto on the part of the non-staff persons, what communication, media platforms or connections they use to conduct their communications and consultations with you, nor any breach of confidentiality or any other matters thereto related. CHC does not have any control over how these persons process your data which they may use in their day to day practice, remote consultations and communications with you.

Please check the terms and conditions of your remote consultations with your practitioner, including any relevant privacy measures. By accepting their invitation and entering the consultation you are consenting to this. We would expect all practitioners and therapists providing remote consultations to CHC registered patients or clients to apply their professional clinical judgement on how and when telephone and video consultation should be used to best support a patient or client's care. These types



174 Manor Lane, Lee, SE12 8LP | [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk) | 020 8297 8887 | [www.chc-lee.co.uk](http://www.chc-lee.co.uk)

of consultations, or classes, should be considered and conducted in the same manner as for in-clinic consultations. The same expectation applies to CHC class-teachers holding remote CHC classes.

## **Marketing**

We would like to send you information by email about our products and services, therapies, courses, classes, newsletter publications and special offers which may be of interest to you.

We will only send you marketing messages when you click to subscribe on our website, or tick the relevant consent box when you provide us with your personal data (eg when you register at the Practice as a patient), or if you are a staff member or CHC non-staff person. If you have consented to receive such marketing from us, you can opt out at any time by using the unsubscribe function on each of our emails or by contacting us directly through the "Contact Us" section of our website or our email address, or in writing to us.

## **WHEN WE MIGHT SHARE YOUR PERSONAL DATA WITH THIRD PARTIES**

As an essential part of being able to provide our CHC services to you, your data is held on the CHC database which is accessible by CHC staff and with more limits to type of access, to CHC non-staff persons.

Your data may also be shared with other Practitioners on a need to know basis only for your treatment, care, health benefit, wellbeing or relaxation. Your data may also be shared with for example, website hosting providers and website developers.

If you are a staff member or non-staff person, your data will be accessible to CHC staff, and directors and on a need to know basis also available to other CHC non-staff persons (eg contact details in the staff address book) and our public domains (eg website and social media) including for marketing of the practice, our and your services.

We do not and will not otherwise sell or give any of your personal data to any third party – including your name, address, date of birth, email address or payment information. We want to earn and maintain your trust, and we believe this is essential in order to do that.

There may be situations where by law and statute we may have to share your information with law enforcement agencies in connection with any investigation to help prevent unlawful activity.

## **HOW WE ASK FOR CONSENT**

In those cases where we need your consent to hold and process your personal data, we will ask you to check a box and/or sign a form requiring consent (except when subscribing to our newsletter via our website, when we will advise you how to subscribe). By checking these boxes/ signing forms you are confirming that you have been informed as to why we are collecting the information, how this information will be used, for how long the information will be kept, who else will have access to this information and what are your rights as a data subject (all of which is set out in this Privacy Policy). We may also seek your consent to hold your information if you are an applicant for a post.

For all CHC staff, we process your personal data on the lawful basis of contract of employment and will hold your information for a period of time should you become a former employee. Any special category data you provide would also be processed under the conditions of obligation as employee and vital interests.

For CHC non-staff persons, we hold your personal data on the lawful basis of implied consent due to our non-contractual business arrangement that you pay rent for use of our services, and that we need to maintain quality assurance (eg keeping copies of your training and insurance records) and to protect the vital interests of patients, clients or students who you treat/ teach on our premises. Any special category data you provide would also be processed under the conditions of legitimate activities and vital interests.

The CHC will hold your data for the options you provide consent to or for the necessary requirements.

### **HOW WE KEEP YOUR DATA SECURE**

To protect your information we have policies and procedures in place to make sure that only authorised personnel can access the information, that information is handled and stored in a secure and sensible manner, and all systems that can access the information have the necessary security measures in place.

All CHC staff and non-staff persons with access to CHC's database or other stores of CHC information and data receive the necessary GDPR awareness training and resources, through a variety of means including, for example, staff meetings, Practice meetings, provision of CHC Data Privacy Policy, to ensure they understand their responsibilities and legal obligations in relation to all of our policies and procedures, and current legislation.

In addition to these operational measures we also use a range of technologies and security systems to reinforce the policies and procedures, including ensuring that:

- Access to personal data is strictly restricted to those CHC non-staff persons who need to access this information as part of their role
- We store your personal data on secure servers and unauthorised external access to personal data is prevented through the use of a firewall
- Where required any communications about CHC patients, staff or non-staff persons is treated confidentially and if required may be anonymised (so that it does not identify you)
- We store your personal data on secure servers / facilities
- To make sure that these measures are suitable, we run vulnerability tests regularly
- Audits to identify areas of weakness and non-compliance are scheduled from time to time as required.



174 Manor Lane, Lee, SE12 8LP | [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk) | 020 8297 8887 | [www.chc-lee.co.uk](http://www.chc-lee.co.uk)

## **HOW LONG WE KEEP YOUR PERSONAL DATA**

We shall only retain your information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, employment or reporting requirements.

As a general rule, patient details are kept on the CHC database for about 3 years and if patients do not make bookings by the end of that period, their personal data will be securely and permanently deleted.

Osteopath Patient Notes which CHC stores and handles for the Osteopaths are subject to the guidance from the Information Governance Alliance regarding the legal requirements and professional best practice relating to the retention and disposal of Health and Social care records. CHC has a Health Record Retention and Disposal Policy in place.

If you would like more information about how long we retain specific types of your information, please contact us on the contact details provided later in this Privacy Policy.

All information you provide via our website and electronic booking system is stored on our secure servers within the European Economic Area ("EEA"). If, in future, any data that we collect from you is transferred to, or stored at, a destination outside the EEA at any time, we will update this Privacy Policy accordingly.

When you link to a social media site directly, or via our website, any personal data which you provide them may be transferred or stored outside the EEA. Please check their websites' privacy notices and policies carefully.

## **YOUR RIGHTS**

1. The right to access information we hold about you:

At any point you can contact us to request the information we hold about you as well as why we have that information, who has access to the information and where we got the information. Once we have received your request we will respond within 30 days.

2. The right to correct and update the information we hold about you:

If the information we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

3. The right to have your information erased:

If you feel that we should no longer be using your information or that we are illegally using your information, you can request that we erase the information we hold. When we receive your request, we will confirm whether the information has been deleted or tell you the reason why it cannot be deleted. Note that specific rules apply for retention of health and medical records and the GDPR and other relevant legislation or guidance will be consulted relating to this.

4. The right to object to processing of your information:



174 Manor Lane, Lee, SE12 8LP | [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk) | 020 8297 8887 | [www.chc-lee.co.uk](http://www.chc-lee.co.uk)

You have the right to request that we stop processing your information. Upon receiving the request, we will contact you to tell you if we are able to comply or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your information to comply with your other rights.

5. The right to ask us to stop contacting you with direct marketing:

You have the right to request that we stop contacting you with direct marketing.

6. The right to data portability:

You have the right to request that we transfer your information to another controller. Once we have received your request, we will comply where it is feasible to do so.

The CHC does not conduct any automated decision making and/ or profiling.

For your security we will need to verify your identity before we process your instructions above. This will include provision of original photographic identity (eg passport or driving licence) and utility bill issued in the last 3 months.

## **COOKIES AND TRACKING**

### Use of cookies

A cookie is a small text file which is placed onto your device when you access our website. We use cookies on our website to make your online experience more efficient and enjoyable.

Cookies are used so we know who you are when your logged into the site. They are stored until you logout. In most cases we will need your consent in order to use cookies on our website.

The exception is where the cookie is essential in order for us to provide you with a product or service you have requested. Tracking cookies may be stored up to 30 days, so we know if you return or to carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests.

### Consent to cookies

If you visit our website when your browser is set to accept cookies, we will interpret this as an indication that you consent to our use of cookies and other similar technologies as described in this Privacy Notice and Policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.

### Turning off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website. For further information about cookies and how to disable them please go to the Information Commissioner's webpage on cookies: <https://ico.org.uk/for-the-public/online/cookies/>.





174 Manor Lane, Lee, SE12 8LP | [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk) | 020 8297 8887 | [www.chc-lee.co.uk](http://www.chc-lee.co.uk)

## TAKE CARE WHEN LINKING TO OUR SOCIAL MEDIA SITES

Our website provides links to our social media sites. Once on any of these social media sites, please take care if you choose to post any information as this will be on a public domain and may be widely accessible. If you would like more information about how any information posted on these sites will be used, please read the relevant site's privacy notice and policy carefully.

## CONTACTING US

If you have any queries about this Privacy Notice and Policy, need further information about how the Complementary Health Centre uses your personal data or wish to lodge a complaint, please contact us by any of the following means:

- Email us at: [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk)
- Contact us using our "Contact us" page on the website.

You also have the right to lodge a complaint with the Information Commissioner's Office directly. Further information, including contact details, is available at <https://ico.org.uk>.

## CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Policy from time to time. You should check this Privacy Policy occasionally to ensure that you are aware of the most recent version that will apply each time you access our website or manage your interaction with CHC as a patient, exercise class student, practitioner, exercise teacher, member of staff, or other.

Where we have made any changes to this Privacy Policy which affects the manner in which we use your personal data, we will contact you by email where possible to inform you of this change.

This Privacy Policy was last updated 24 April 2020 on behalf of the Complementary Health Centre.

Version1. 24 May 2018. Reference: <https://ico.org.uk/for-organisations/>

### CHC Responsibility Statement:

The information contained in this Policy represents the CHC's interpretation of the law as at the date of this edition. The CHC takes all reasonable care to ensure that the information contained in this Policy is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed. However, before taking any action based on the contents of this Policy, readers are advised to confirm the up to date position and to consult the ICO on the reference, or relevant professional organisation/ association or body, regarding their individual circumstances.

If you have any queries, questions or comments on the information contained in this policy, kindly contact the CHC on [info@chc-lee.co.uk](mailto:info@chc-lee.co.uk).