

Clacton Osteopathy & Physiotherapy Clinic GDPR Privacy Notice

Outline

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR) which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

1 – Clacton Osteopathy & Physiotherapy Clinic (COP Clinic), is pleased to provide the following information:

2 – Who we are

COP Clinic diagnose and treat health conditions. The practice also provides other treatments, about which our staff will be pleased to provide more details. This document is all encompassing for those persons receiving any of our therapies. Treatments are carried out in accordance with the Institute of Osteopathy's patient charter <http://www.iosteopathy.org/osteopathy/the-patient-charter/>. The practice may also provide other treatments, about which our staff will be pleased to provide more details.

3 – Personal Data

a) For the purposes of providing treatment, COP clinic may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your medication, treatment and other issues affecting your health. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow the company to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments and provide reports or other information concerning your treatment.

Clacton Osteopathy and Physiotherapy Clinic

22 Pallister Road, Clacton-on-Sea, CO15 1PG

E: contact@cop-clinic.co.uk

T: 01255 781388

W: www.clacton-osteopathy-and-physiotherapy.co.uk



As part of our obligations as primary healthcare practitioners there may be circumstances related to your treatment, on-going care or medical diagnosis that will require the sharing of your medical records with other healthcare practitioners e.g GPs, consultants, surgeons and/or medical insurance companies. Where this is required we will always inform you first unless we are under a legal obligation to comply.

b) For marketing purposes, COP Clinic may also use the contact details provided by you to respond to your enquiries, including making telephone contact and emailing information to you which the practice believes may be of interest to you.

c) In making initial contact with COP Clinic you consent to COP Clinic maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. COP Clinic may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us. COP Clinic do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this Privacy Notice.

d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

e) COP Clinic website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Custom PHP uses cookies to help the company to identify and track visitors and their website access preferences. COP Clinic website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the company website.

f) COP Clinic will only collect the information needed so that we can provide you with the services you require, the business does not sell or broker your data.

4 – Legal basis for processing any personal data

To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

5 – Legitimate interests pursued by the COP Clinic.

To promote treatments for patients with all types of health problems indicated for osteopathic/physiotherapy care.

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6 – Consent

Through agreeing to this privacy notice you are consenting to the company processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this Privacy Notice.

7 – Disclosure

COP Clinic will keep your personal information safe and secure, only staff engaged in providing your treatment will have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. COP Clinic will not disclose your Personal Information unless compelled to, in order to meet legal obligations, regulations or valid governmental requests. COP Clinic may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

8 – Retention Policy

COP Clinic will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

9 – Data storage

All Data is held in the United Kingdom. COP Clinic does not store personal data outside the EEA.

10 – Your rights as a data subject

At any point whilst the company is in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.

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- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that COP Clinic refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request the company can confirm what information it holds about you and how it is processed.

11 – You can request the following information:

- Identity and the contact details of the person or organisation (the company) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the company and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 – To access what personal data is held, identification will be required

COP Clinic will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If the company is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to contact@cop-clinic.co.uk or by phoning [01255 781388](tel:01255781388) or writing to us at the address further below.

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13 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by COP Clinic you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO.

The details for each of these contacts are:

James Acres, Data Protection Officer, Clacton Osteopathy & Physiotherapy Clinic 22 Pallister Road, Clacton, CO15 1PG

Telephone: [01255 781388](tel:01255781388) or email: contact@cop-clinic.co.uk

ICO
Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone [+44 \(0\) 303 123 1113](tel:+44(0)3031231113) or
email: <https://ico.org.uk/global/contact-us/email/>

Website Privacy Policy

This Policy applies as between you, the User of this Website and COP Clinic, the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

Data

means collectively all information that you submit to COP Clinic via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;

Cookie

means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;

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Clacton Osteopathy & Physiotherapy Clinic

means the operator and provider of this Website. COP Clinic is a trading name of James Acres Ltd. Registered in England & Wales. Registered Company No. 14250947. Registered Office: 33 Mede Way, Wivenhoe, Essex, CO7 9HW.

UK and EU Cookie Law

means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

User

means any third party that accesses the Website and is not employed by COP Clinic and acting in the course of their employment;

Website

means the website that you are currently using (www.clacton-osteopathy-and-physiotherapy.co.uk) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of COP Clinic and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

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3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

- 3.1 name;
- 3.2 date of birth;
- 3.3 gender;
- 3.4 job title;
- 3.5 profession;
- 3.6 contact information such as email addresses and telephone numbers;
- 3.7 demographic information such as post code, preferences and interests;
- 3.8 financial information such as credit / debit card numbers;
- 3.9 IP address (automatically collected);
- 3.10 web browser type and version (automatically collected);
- 3.11 operating system (automatically collected);

4. Our Use of Data

4.1 Any personal Data you submit will be retained by COP Clinic for twelve months.

4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties. This does not include our affiliates or other companies within our group.

4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.

4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- 4.4.1 internal record keeping;
- 4.4.2 improvement of our products / services;
- 4.4.3 transmission by email of promotional materials that may be of interest to you;
- 4.4.4 contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.

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5. Third Party Websites and Services

5.1 COP Clinic may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to certain personal Data provided by Users of this Website.

5.2 Any Data used by such parties is used only to the extent required by them to perform the services that COP Clinic requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties shall be processed within the terms of this Policy and in accordance with the Data Protection Act 1998.

6. Links to Other Websites

This Website may, from time to time, provide links to other websites. COP Clinic has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

7. Changes of Business Ownership and Control

7.1 COP Clinic may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of COP Clinic. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

7.2 In the event that any Data submitted by Users is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will not be given the choice to have your Data deleted or withheld from the new owner or controller.

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8. Controlling Use of Your Data

8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

8.1.1 use of Data for direct marketing purposes; and

8.1.2 sharing Data with third parties.

9. Your Right to Withhold Information

9.1 You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.

9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12.

10. Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by COP Clinic (where such data is held) on payment of a small fee which will not exceed £25.

11. Security

11.1 Data security is of great importance to COP Clinic and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.

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12. Cookies

12.1 This Website may place and access certain first party Cookies on your computer. First party cookies are those placed directly by COP Clinic via this Website and are used only by COP Clinic. COP Clinic uses Cookies to improve your experience of using the Website and to improve our range of services. COP Clinic has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

12.2 By using this Website you may receive certain third party Cookies on your computer. Third party cookies are those placed by websites and/or parties other than COP Clinic. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

12.3 Certain features of the Website depend upon Cookies to function. UK and EU Cookie Law deems these Cookies to be “strictly necessary”.

12.4 This Website uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling us to better understand how Users use the Website. This, in turn, enables us to improve the Website and these services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our business.

12.5 The analytics services used by this Website use Cookies to gather the required information. Certain of these Cookies may be placed immediately when you decide to visit the Website and it may not be possible to obtain your prior consent. You may remove these Cookies and prevent future use of them by removing from your browser.

12.6 You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

12.7 You can choose to delete Cookies at any time however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

12.8 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

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13. Changes to this Policy

COP Clinic reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.

2023

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