

# Toll House Clinic Limited Privacy Policy

We are committed to protecting the privacy of our patients. We take your privacy seriously and treat all the information you give us with great care.

As a data controller we make every endeavour to comply fully with the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other relevant legislation including the EU General Data Protection Regulation (GDPR).

#### **We Promise**

- To be clear about why we need to collect your personal information and what we are going to use it for.
- To make it easy for you to tell us how you would like us to keep in touch.
- To collect the information, we need to make sure we deliver the best service.
- To never sell or share your personal information, or let other organisations use if for marketing.
- To take good care of your personal information, and make sure it is up to date, safe and secure at all times.
- To make sure that any suppliers or partners who carry out work on our behalf meet the same high standards that we adhere to when handling your personal information.

### **Policy Overview**

We collect personal information from our patients, in opting to share your personal information with us, you will be agreeing to our collection and use of your information as described in this policy. If you no longer want us to process your personal details you can ask us to stop at any time by contacting <a href="mail@tollhouseclinic.co.uk">mail@tollhouseclinic.co.uk</a>

We use the information you share with us to:

- Make sure you receive the product, service or information you have requested.
- Carry out reasonable administration of your details and keep internal records.
- To keep in touch with you in the way that you want us to.

We will need to make changes to this policy from time to time, to make sure that we are always providing you the latest information about what is happening to your personal information.

### What information do we collect?

Without limitation, any of the following Data may be collected:

- Name
- Date of birth
- Gender
- Contact information such as email addresses and telephone numbers
- Demographic information such as post code, preferences and interests
- Details of services and products used
- Financial information such as credit / debit card number (This data is stored by the payment system and never held by Toll House Clinic)
- Medical information

# What we do with your information

#### **Processing**

We will make sure that you receive the service you have requested, process any payments and send you information relating to that service.

We will also do our best to keep your information up to date. This includes monitoring returned mail to let us know if you no longer live at the address we hold for you.

Please do let us know if your details have changed.

#### Marketing

Receiving marketing information from Toll House Clinic will always be your choice. You can change your mind at any time and we will keep your preferences up to date.

We limit the number of marketing communications we send to make sure we are not sending you too much but we will try and send you sufficient information so that you do not miss relevant news. We will only contact you for marketing purposes by telephone or text message (SMS) if you have told us we can.

We will only contact you by email if you have told us you would like to hear from us this way.

### Who will have access to my information?

Your information will only be accessible to our staff or contractors if they are trained and it is appropriate in order for them to carry out their role in line with their job role and this Privacy Policy. We will never sell your personal information, or let other organisations use it for their own purposes. We will only share your personal information where:

We are legally required to, or as a result of a lawful request by a government or law enforcement authority.

Any data used by a contractor will be used only to the extent required by them to perform the services that Toll House Clinic Limited requests. Any use for other purposes is strictly prohibited. Any Data that is processed by third parties must be processed within the terms of this Policy and in accordance with the Data Protection Act 1998 and GDPR.

Our Patient Data is stored within our Private Practice Software cloud based on line, hosted system. This is secure and encrypted and governed by their data protection policy <a href="www.rushcliff.com">www.rushcliff.com</a>
Our provider is ISO 27001 certified security on site 24/7/365 with off-site backup to deal with any major event. CCTV cameras, motion detection and a key fob access system ensure multiple layers of security and peace of mind. Our servers have an Enterprise-Class firewall in place with a bespoke strategy continually developed closely with our provider.

Limited Data (name & email) may be shared with Physiotools Exercise Prescription as part of your treatment programme. Their privacy policy can be viewed at <a href="https://www.physiotools.com/privacy-policy">www.physiotools.com/privacy-policy</a> With your consent your data may be shared with your doctor or occupational health department or insurer.

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

# How do we keep your information safe?

The security of your personal information is paramount to us. Our networks are regularly monitored to ensure they remain secure and all computers used by Toll House Clinic are password protected.

We also regularly review our measures to ensure they are as far as reasonably possible up to date and in line with latest developments, particularly when we are handling payment information.

Data that is transmitted via the internet or in email, cannot be 100% secure.

We will take every reasonable precaution to keep your information safe but it cannot be guaranteed and so please be aware that any information you do transmit to us is at your own risk. Once we have received your information we will use our best efforts to ensure its safety within our network. We will only hold your personal information for eight years unless we are required to hold it longer for legal or taxation reasons.

If we dispose of your information it will always be done securely.

# **Change of Business Ownership and Control**

Toll House Clinic from time to time, expand or reduce its business. This may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by you will, where it is relevant will be transferred under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

#### **Controlling Access to your Data**

You have the right to a copy of the information we hold about you. This is called a subject access request. If you would like to make a subject access request you can do so by contacting us at <a href="mail@tollhouseclinic.co.uk"><u>email@tollhouseclinic.co.uk</u></a> and we will provide you with it as soon as possible.

You have the right to have incorrect information corrected and the right to object to further processing of your personal information for direct marketing.

You also have the right to request that your data be deleted from our records at any time. If you would like to make such a request, you can do so by contacting us at <a href="mail@tollhouseclinic.co.uk">email@tollhouseclinic.co.uk</a>

If you need help or have any questions about this policy and your rights regarding the processing of your personal information please contact:

Senior Information Rights Officer

English Heritage Engine House Fire Fly Avenue Swindon SN2 2EH

For broader advice and guidance please contact the data protection regulator:

The Information Commissioner

Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

# **Changes to this Policy**

Toll House Clinic Limited reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required in law.