

## Privacy Notice

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Back2Health collecting/processing their personal data.
- 2.2 All staff of Back2Health who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

#### 3.1 Who are we?

Back2Health provides chiropractic, osteopathic, physiotherapy and allied services. The company comprises of four separate businesses operating as a common brand. These businesses share values of providing professional, friendly and effective care. Each operates under common procedures and processes yet they remain distinct.

Our Data Protection Officer and data protection representatives can be contacted directly here:

#### **Back2Health Midhurst or Back2Health NHS Services**

Responsible person: **Jonathan Field**. Ta Back2Health Partnerhip. 84 Fawcett Road, Southsea, PO4 0DN Alternatively, you may ask for an appointment with: Jonathan Field. Telephone 01730 263232. E-mail [jonathan@b2haqp.co.uk](mailto:jonathan@b2haqp.co.uk)

#### **Back2Health Basingstoke (not NHS Services)**



Responsible person: **Vera Christensen**. Vera Christensen ta Back2Health Basingstoke, 18 Cliddesden Road, Basingstoke, Hampshire RG21 3DU Alternatively, you may ask for an appointment with: Vera Christensen. Telephone 001256466266. E-mail: vera.christensen@b2h.co.uk

### **Back2Health Petersfield and Alton**

Responsible person: **Mark Christensen**. Mark Christensen ta Back2Health Petersfield & Alton. 2 Charles Street, Petersfield, Hampshire, GU32 3EH Telephone 01730 267423. Email mark@b2h.co.uk

### **Back2Health Southsea**

Responsible person: **Wayne Chester-Davis**. W Chester-Davis Ltd ta Back2Health Southsea. 84 Fawcett Road, Southsea, PO4 0DN. Alternatively, you may ask for an appointment with: Wayne Chester-Davis. Telephone 02392870707. E-mail: wayne@b2hsouthsea.co.uk

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b>
Contact details	From referrer or individual data subject
Referral information	From referrer
Financial information including insurers	From referrer or individual data subject

The personal data we collect will be used for the following purposes:

- To enable us to provide care to you
- To help us assess our services with a view to continual improvement
- To enable us to manage our finances including invoicing for our services

Our legal basis for processing for the personal data:

- Contractual obligations

Any legitimate interests pursued by us, or third parties we use, are as follows:

- None

The special categories of personal data concerned are:

- Health data

### 3.2 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Back2Health to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time and we have a specific withdrawal of consent form for you to complete if required.

As we are contractually obligated to keep records related to care withdrawal of consent will necessitate our stopping treatment.

### 3.3 **Disclosure**

Back2Health will not pass on your personal data to third parties without first obtaining your consent.

### 3.4 **Retention period**

Back2Health will process personal data for the duration of your care and will store the personal data for 8 years after your last session with us or 8 years after your 18<sup>th</sup> birthday.

### 3.5 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, 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 to 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.

- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Back2Health refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Back2Health or how your complaint has been handled, you have the right to lodge a complaint with Back2Health's Data Protection Officer / data protection representatives or directly the with the Information Commissionaires Office (ICO).

Details on how to complain can be found at:

Back2Health - <https://www.b2h.co.uk/wp-content/uploads/2017/12/b2h-making-a-complaint.pdf>

ICO - <https://ico.org.uk/make-a-complaint/>

## 4. **Online privacy statement**

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

### How we use your information

This privacy notice tells you how we, Back2Health, will collect and use your personal data for providing you care, improving our services and managing our finances including raising invoices to you.

### Why does Back2Health need to collect and store personal data?

In order for us to provide you with the health care services you need, we need to collect personal data for both correspondence purposes and your detailed healthcare provision. In any event, we are committed to ensuring that the

information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, Back2Health would contact you for additional consent.

Will Back2Health share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Back2Health in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Back2Health's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Back2Health use the personal data it collects about me?

Back2Health will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Back2Health is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Back2Health contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Back2Health at your request, can confirm what information we hold about you and how it is processed. If Back2Health does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- 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 Back2Health or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, 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.
- 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.

What forms of ID will I need to provide in order to access this?

Back2Health accepts the following forms of ID when information on your personal data is requested: Passport, driving licence or birth certificate

Contact details of the Data Protection Officer / data protection representative are provided in 3.1 above

***Document Owner and Approval***

The Data Protection Officer is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Signature:

Date:

**Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	23/5/2017	23/5/2017