

# GDPR PRIVACY NOTICE



## PRIVACY POLICY

### ROAD TO RECOVERY THERAPY – PAIN & INJURY MANAGEMENT

This document refers to personal data, which is defined as information that relates to an identified or identifiable living individual. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR). Everyone responsible for using personal data has to follow strict rules known as 'data protection principles'.

"We", "our" or "us" refers to Road To Recovery Therapy – Pain & Injury Management.

Road To Recovery Therapy – Pain & Injury Management is committed in protecting and respecting your privacy. This privacy notice explains when and why we collect personal information, how we use it, who we share it with and how we keep it secure.

It is important that you take the time to read this notice so that you understand how we will use your personal data and your rights in relation to your personal data.

#### 1. **Personal data that we collect about you (information you give us)**

- Personal data is information about you. The information you give us by filling in forms or by corresponding with us verbally or via telephone, e-mail, online, or social media. The information you give us may include your name, postal address, e-mail address, telephone number, date of birth, sex, occupation, GP details, health and medical information including medication and personal details about your lifestyle.
- We are required to collect personal information about you such as your name, postal address, e-mail address and telephone number as we may wish to contact you to confirm an appointment, to remind you of future appointments, or to update you on a matter relating to your health, treatment or aftercare.
- We are required to collect personal information about you and your health such as your date of birth, sex, occupation, health and medical information, medication and lifestyle in order to rule out any medical risk factors which may prevent treatment, to ensure that we can provide you with a bespoke and safe treatment plan and to ensure that we provide you with the best possible treatment and care.
- We may be required to collect personal information about you such as your General Practitioners (GP's) details when there are circumstances relating to your treatment, on-going care or medical diagnosis that require the sharing of your medical and health records for referral purposes. Where this is required, we will always inform you first and your consent will be gained.
- You can of course refuse to give us your personal information, however in doing so we may not be able to provide you with treatment.

#### 2. **Marketing**

- We may wish to send you some general health information, the occasional promotional offer or updates relating to our business. These may be in the form of an email, article, newsletter or via social media.
- We will use the contact details provided by you to carry out any direct marketing correspondence or to respond to your enquiries, including making telephone contact and emailing information to you.
- In making initial contact with us you consent to opening up a marketing dialogue, therefore you will automatically be opted in to receive direct marketing correspondence from us.

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- You are able to withdraw from direct marketing and all other types of correspondence by unsubscribing via our patient consultation form, by opting out using the link attached to our marketing material or by getting in contact with our **data controller**.

### 3. How your personal data is recorded & stored

- Your personal data is recorded on paper via our patient consultation forms.
- Your personal data is recorded electronically on a third-party's software such as Cliniko, Rehab My Patient and Mailchimp. All third-party software used is fully compliant with the General Data Protection Regulations Act 2018.
- Your personal data may be recorded on Microsoft products such as Excel, Word and Outlook all of which are fully compliant with the General Data Protection Regulations Act 2018. These documents are stored on an encrypted, password protected MacBook and stored in a locked room.
- All data stored electronically is encrypted, password protected, and the passwords are regularly changed.
- All paper records are stored in a locked filing cabinet, located in a securely locked room. Overnight the premises are locked and alarmed.
- We have a legal obligation to retain your records for 8 years after your most recent appointment. After this period, you can request that we erase your records. Otherwise, we will retain your records indefinitely in case you require our services in the future.
- If you engage with us via our social media platforms (Facebook, Instagram or Google) you should be aware that your posts are public and for all to see. Private messages sent to us remain private. All social media accounts are password protected which only our data controller has access to.

### 4. Sharing your personal data

- Some of your personal data (your name, email address & date of birth) may be provided to Rehab My Patient, which is a third-party's software for the purposes of exercise prescription, rehabilitation and aftercare advice. Your personal data is only accessible by practitioners directly related to our business. Rehab My Patient is fully compliant with the General Data Protection Regulations Act 2018. Access to this software is password protected and is only accessible by our data controller.
- Your personal data will be provided to Cliniko which is a third-party's software for the purposes of appointment setting, note taking and patient relationship management. Your personal data is only accessible by practitioners directly related to our business. Cliniko is fully compliant with the General Data Protection Regulations Act 2018. Access to this software is password protected and is only accessible by our data controller.
- Some of your personal data (your name, email address, postal address & date of birth) may be provided to Mailchimp, which is a third-party's software for the purposes of direct marketing and newsletters. Your personal data is only accessible by practitioners directly related to our business. Mailchimp is fully compliant with the General Data Protection Regulations Act 2018. Access to this software is password protected and is only accessible by our data controller.
- Your personal data may be responsibly shared with other healthcare professionals such as Sports Therapists, Physiotherapists, Osteopaths, Chiropractors, General Practitioners (GP's) or Consultants when there are circumstances relating to your treatment, on-going care or medical diagnosis that require the sharing of your medical and health records and/or for referral purposes. Any data shared will be documented and your informed consent will be gained, prior to sharing your data.
- If you are under the age of 18 or considered vulnerable then your personal data may be shared with your appropriate adult, carer or chaperone.
- We will never share your personal data with anybody that does not need access to it without your informed consent.

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## 5. Your rights

### You have the right to:

- Refuse us processing your personal data. Please note that in doing so we may not be able to provide you with treatment.
- Request a copy of the personal data which we hold about you.
- Withdraw your consent to us processing your personal data at any time.
- Request that we rectify your personal data if it is inaccurate or incomplete.
- Request that we erase the personal data that we hold about you. Please note that there may be circumstances where you ask us to erase your personal data, but we are legally obligated to retain it.
- Object to the processing of your personal data for the purpose of direct marketing.
- Complain to or the **Information Commissioners Office (ICO)** if you think that your personal data has been misused by us.

## 6. Use of Cookies

A cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing a website. We use cookies to store your preferences and other stateful information on your computer in order to save you time repeatedly entering the same information and to display your personalised content and appropriate advertising on your later visits to our website. You can modify your browser to turn off the cookie feature. However, if you do so you may not be able to use or access our web site properly.

## 7. Use of cameras

The static premises associated with us has CCTV cameras situated inside the main building and outside to the front and rear, but not inside our treatment room or reception area. The cameras & business itself are both registered with the **Information Commissioners Office (ICO)**.

## 8. Complaints

In the event that you wish to make a complaint about how your personal data is being handled you have the right to complain to us. Complaints need to be sent in writing via letter or email to our **Data Controller**.

### Data Controller Details:

Luke Wooding

Address: Suite 2, 8 Steel Close, Eaton Socon, St Neots, Cambs, PE19 8TT.

Email: [Luke@trrtherapy.co.uk](mailto:Luke@trrtherapy.co.uk)

If you are still dissatisfied with the response or do not receive a response within 30 days, then you can complain to the **Information Commissioners Office (ICO)**.

### ICO Details:

Address: Wycliffe House, Water Lane, Wilmslow SK9 5AF

Telephone: 0303 123 1113

Email: <https://ico.org.uk/global/contact-us/email/>