

## Lockswood Dental Practice- Privacy Policy

At the Lockswood Dental Practice we are committed to protecting your right to privacy and confidentiality of your personal information. In keeping with new data protection laws, this policy sets out how we obtain, store, use, safeguard your personal information and also why we hold and process it, who we might share it with, and your rights and freedoms under the Law.

The privacy policy can be changed by us at any time. If we make changes to our privacy policy, we will advise you of any material changes or updates.

### Our details

The Lockswood Dental Practice is the Data Controller of the personal data you provide to us. We are registered with the Information Commissioners Office (ICO) and as a data controller under the terms of the Data Protection Act 2017 and the requirements of the EU General Data Protection Regulation (GDPR).

Our Data Protection Officer for the Data Controller is **Aaron Campbell**. You can contact the Data Protection Officer by writing to:

*Lockswood Dental Practice,*  
*38 Centre Way*  
*Southampton,*  
*SO31 6DX*  
Email [enquiries@lockswooddentalpractice.co.uk](mailto:enquiries@lockswooddentalpractice.co.uk).

### PERSONAL INFORMATION

All your personal information that you provide to us, including sensitive personal information such as medical information will be held and used in accordance with the EU General Data Protection Regulation 2016/679 ('GDPR'), any national laws implementing GDPR and any legislation that either replaces it in whole or in part or that relates to the protection of personal data.

### How we collect personal data?

We collect your personal data during face to face consultations, over the telephone, through written and email correspondence or when you submit an online enquiry through our website. We DO NOT source any personal information from public available sources or third party vendors.

### What personal data do we collect?

In order to provide you with our services we need to hold personal information about you in the following categories:

INFORMATION TYPE	EXAMPLES
<b>Patient clinical and health data and correspondence</b>	<ul style="list-style-type: none"> <li>• your past and current medical and dental condition</li> <li>• personal details such as your date of birth, national insurance number/NHS number, address, telephone number</li> <li>• your general medical practitioner</li> <li>• radiographs, clinical photographs and study models</li> <li>• treatment plans- information about the treatment that we have provided or propose to provide, its cost and consent to treatment</li> <li>• notes of conversations/incidents that might occur for which a record needs to be kept</li> <li>• Correspondence relating to you with other health care professionals, for example in the hospital or community services.</li> </ul>
<b>Staff employment data</b>	
<b>Contractors' data</b>	

### How we process your Information

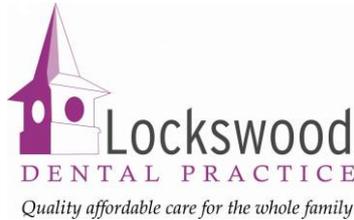
“Process” means we obtain, store, update and archive data. We only process information that we require to carry out the services we have agreed to provide you with (‘legitimate business purposes’) This includes the provision of further services (referrals to other health professionals and laboratories) by sharing your information with these trusted third parties.

### Keeping you Informed

We would like to keep in touch with you regarding important changes at the practice, events or offers. It is important that we know if and how you would like to be contacted. You will be asked to complete a ‘Contact Consent’ form on our clinic pads. where you will be given the option to opt out of such communications. You have the right to withdraw or update your preferences at any time.

### Why we process Personal Data (what is the ‘purpose’)?

1. Comprehensive and accurate patient data is held for the purpose of providing patients with appropriate, high quality, safe and effective dental care and treatment.
2. Staff employment data is held in accordance with Employment, Taxation and Pensions law.
3. Contractors’ data is held for the purpose of managing their contracts.



## What is the Lawful Basis for processing Personal Data?

Under GDPR, the main grounds that we rely upon in order to process your information are the following:

- 1) Necessary for compliance with a **Legal Obligation**:
  - We hold staff employment data because it is a **Legal Obligation** for us to do so.
  - In very limited circumstances or when required by law or a court order, personal data may have to be disclosed to a third party not connected with your health care. In all other situations, disclosure that is not covered by this Code of Practice will only occur when we have your specific consent. Where possible you will be informed of these requests for disclosure.
- 2) Necessary for the purposes of a **Legitimate Interest**:
  - Either we or a third party (laboratory/ other health professional) will need to process your information for the purpose of Legitimate Interest, provided we have established that those interests are not overridden by your rights and freedoms, including the right to have your information protected.
  - We hold patients' data because it is in our **Legitimate Interest** to do so. Without holding the data we cannot work effectively. Also, we must hold data on NHS care and treatment as it is a **Public Task** required by law.
- 3) **Necessary to Fulfil a Contract**. We hold contractors' data because it is needed to **Fulfil a Contract** with us.

## Who might we share your data with?

In order to provide proper and safe dental care, we may need to disclose personal information about you to:

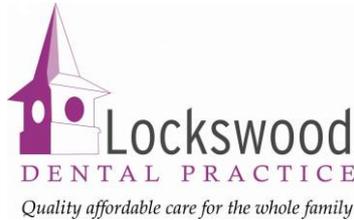
- your general medical practitioner
- the hospital or community dental services
- other health professionals caring for you
- Dental laboratories
- NHS payment authorities
- the Inland Revenue
- the Benefits Agency, where you are claiming exemption or remission from NHS charges
- Private dental schemes of which you are a member.

Employment data will be shared with government agencies such as HMRC.

Disclosure will take place securely on a 'need-to-know' basis, so only those individuals/organisations who need to know in order to provide care to you.

## How long we hold onto your information

We will store patient data for as long as we are providing care, treatment or recalling patients for further care. We will archive (store without further action) for as long as is



required for legal purposes as recommended by the NHS, other regulatory bodies and in accordance with UK law

We must store employment data for six years after an employee has left.  
We must store contractors' data for seven years after the contract is ended.

### **Security of information**

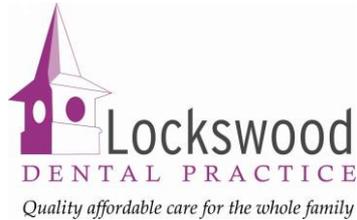
We are committed to keeping your personal information secure. We have put in place physical, electronic and operational procedures intended to safeguard and secure the information we collect from accidental or unlawful destruction, loss, alternation, unauthorised disclosure of, or access. Our service providers are also selected carefully and required to use appropriate protective measures.

Personal data about you is held in the practice's computer system and in a manual filing system. The information is not accessible to the public and only authorised members of staff have access to it. Our computer system has secure audit trails and all data is stored securely for back-up purposes with our computer software suppliers Software of Excellence.

### **Your Rights**

You have certain rights in relation to the personal information we hold about you. Details of these rights and how to exercise them are set out below.

1. **Right of Access** You have the right at any time to ask us for a copy of the information we hold about you and to confirm the nature of the information and how it is used. We ask you contact us directly and for any request to be done in writing by either email or letter. We will acknowledge your request and supply a response within one month or sooner. Where we have good reason, and if the GDPR permits, we can refuse your request or certain elements of the request. If we refuse your request or any element of it, we will provide with our reasons for doing so.
2. **Right of Correction or Completion** If the information we hold about you is not accurate, incomplete or out of date and requires amendment or correction, you have the right to have your data rectified, updated or completed. You can let us know by contacting us directly.
3. **Right of Erasure** In certain circumstances, you have the right to request that information we hold about you is erased.
4. **Right to Object to or Restrict Processing** In certain circumstances, you have the right to object to our processing or restrict our use of your information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy. You have the right to object to use of your information for direct marketing purposes.
5. **Right to Data Portability** You can ask us to transfer your data to someone else if you consent for us to do so and it is safe and legal to do so.



You can exercise any of the above rights by contacting us at the address or email address set out above. You have the right to object, but this may affect our ability to provide you with dental care. All requests must be in writing and we will acknowledge your request and supply a response within one month or sooner. You can exercise your rights free of charge. We are unable to comply with requests that relates to the information of others without their consent.

Most of the above rights are subject to limitations and exceptions. Where we have good reason, and if the GDPR permits, we can refuse your request or certain elements of the request. We will provide reasons if we are unable to comply with any request.

### **How to raise a concern**

If you wish to raise a concern about our data processing, you can do so in the first instance to our Data Protection Officer **Aaron Campbell** and will do our best to resolve the matter.

*Lockswood Dental Practice,*

*38 Centre Way*

*Southampton,*

*SO31 6DX*

Email [enquiries@lockswooddentalpractice.co.uk](mailto:enquiries@lockswooddentalpractice.co.uk)

If this fails, you can complain to the UK Information Commissioner's Office at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or by calling 0303 123 1113. Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF