# Patient Privacy Notice

As a self-employed dental professional, I mostly use personal data of patients treated by me at the dental practices I work at.

Please see the privacy notice of the practice where I provide treatment for further details of how the practice and I use patient data for joint purposes such as providing safe and effective dental treatment. You can contact me using the details below for an up-to-date list of the practices I have and currently work with.

This privacy notice outlines how I handle patient information according to the UK GDPR and Data Protection Act 2018 (DPA18) for data processing operations I am responsible for as the sole data controller.

#### Our Contact Details

Name:	Dr Saba Qureshi
Email:	Info@orthodontics-london.co.uk

## **Collecting Your Personal Data**

Most of the personal information I process is provided to me directly, such as when you contact me on social media, engage with my website or during a dental appointment.

Occasionally, however, I may receive patient information from other sources such as:

- Another dental professional that has treated you
- The NHS, a regulator or other authority, such as the Police.
- Insurance or dental plan provider
- Your solicitor

I may receive data from third parties, including analytics providers such as Google located outside the UK, advertising networks such as Facebook situated outside the UK providers of technical, payment and delivery services.

#### The Types of Personal Information I Collect and Process

Where appropriate, efforts are made to anonymise your information for some of the purposes listed below. Otherwise, this privacy notice will apply to situations where I cannot anonymise the information, or the purpose requires the use of personal data.

The table below sets out the main types of patient information I process,

#### Categories of Personal Data:

Categories of Personal Data	Examples of Personal Data	
Basic Personal Data/Identifiers	Name, Contact Details, Patient Reference number, NHS number, date of birth, signatures, photos and videos, physical characteristics, Occupation, social media handle	
Family Details	Next of kin, and details of any guardians, carers and representatives.	
Technical data	Data about your use of my website such as your IP address, your login data, details about your browser, length of visit to pages on my website, page views and navigation paths, details about the number of times you use my website, time zone settings and other technology on the devices you use to access my website or social media channels.	
Communication data	Personal data contained in emails, comments on social media posts, letters, instant messages. Also includes your feedback and testimonials	
Health Data	Medical and dental histories, lifestyle questions (e.g. alcohol and tobacco use), x-rays, clinical photographs, digital scans of your mouth and teeth, study models, treatment plans, patient understanding exercises, recorded communications (e.g. voice messages, video calls, instant messages, letters and emails), clinical notes made by clinical staff and other	

Categories of Personal Data	Examples of Personal Data	
	dental professionals involved in your care and treatment, information of any health and safety incident you have been involved in.	
Ethnicity Information	Where relevant, I may need to process your ethnic group and language.	
Religious and philosophical beliefs	Where relevant to your care, such as fasting or abstaining from certain types of treatments.	

### The Purposes and Lawful Grounds of Processing

By applying the data protection principle of data minimisation, I only use personal data, which is necessary for a specific purpose.

Purposes	Example	Lawful Grounds of Processing (depending on the circumstances)
Advertising and Publicity	Such as when you sign up for my newsletter, where I use your identifiable images on my social media channels and website	Consent, Explicit Consent (where special category data is used], Necessary for the performance of a Contract
Defending Legal Claims	In the event, I am required to use personal data to defend a dental negligence claim.	Necessary for my Legitimate interest, Establish a Legal Defence (where special category data is used]
Lecturing and Education	Such as if I wish to use carefully selected personal data to train other medical professionals	Consent, Explicit Consent (where special category data is used],
Managing Communications	Such as when you communicate with me directly through my website, email or social media	Consent, Necessary for my Legitimate interest Explicit Consent, Provision of Health Treatment or to Establish a Legal Defence (where special category data is used],
Technical data	Data about your use of my website such as your IP address, your login data, details about your browser, length of visit to pages on my website, page views and navigation paths, details about the number of times you use my website, time zone settings and other technology on the devices you use to access my website or social media channels	Necessary for my Legitimate interest, Consent

## Withdrawing Consent

The above table sets out where I rely on your consent to process your personal data. You can request to withdraw your consent for these purposes by contacting the practice using the contact details found at the top of this notice.

## **Storing Your Data**

Your information is securely stored paper and digital formats. I use online and cloud-based digital storage. Where data is stored outside of the UK I ensure the correct legal protections are in place to ensure compliance with international data transfer rules.

## How Long Do I Keep Your Data For?

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including to satisfy any medical, legal, accounting, or reporting requirements.

When deciding the correct time to keep the data, I look at the amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, and ongoing necessary purposes of processing.

Please refer to the privacy notice of the practice you were treated at for more information on how long they retain your data for their purposes.

### Sharing Your Personal Data

As the sole data controller for the purposes listed above it may be necessary for me to share your personal data with the following third parties:

- Your GP
- The hospital or community dental services or other health professionals caring for you
- Private dental plans (if applicable) of which you are a member.
- Dental labs
- Dental Associations, Educators

- The General Dental Council and other healthcare regulators
- NHS entities
- Any professionals advising me or you, such as any lawyers and insurance companies
- My IT system providers
- Your next of kin

I will only disclose your information on a need-to-know basis and limit any information I share to the minimum necessary.

Although highly unlikely, there may be circumstances or if required by law, where I may need to disclose your information to HMRC or other law enforcement or government agencies.

### International Transfer of Personal Data

Where I transfer your data to third parties outside of the UK, I will ensure that certain safeguards are in place to provide a similar degree of security for your personal data. As such:

- I may transfer your personal data to countries that the UK has approved as providing an adequate level of protection for personal data by; or
- If I use US-based providers that are part of a UK approved legal privacy framework, I may transfer data to them, as they have appropriate safeguards in place; or
- Where I use certain service providers who are established outside of the UK, I may use specific contractual clauses approved by the European Commission, giving personal data the same protection it has in Europe.

If none of the above safeguards is available, I may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

## Knowing Your Information Rights

Under data protection law, you have rights including:

Your right of access – You have the right to ask me for copies of your personal information.

**Your right to rectification** – You have the right to ask me to rectify personal information you think is inaccurate. You also have the right to ask me to complete information you think is incomplete.

Your right to erasure – You have the right to ask me to erase your personal information in certain circumstances.

**Your right to restriction of processing** – You have the right to ask me to restrict the processing of your personal information in certain circumstances.

Your right to object to processing – You have the right to object to processing your personal information in certain circumstances.

**Your right to data portability** – You have the right to ask that I transfer the personal information you gave me to another organisation or you in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, I have one month to respond to you.

Depending on the nature of the request I may need to ask you to provide further to information to verify your identity and/or better understand your request.

#### How To Complain

If you have any concerns about my use of your personal information, you can complain using the contact details at the top of this notice.

You can also complain to the ICO

### The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: **0303 123 1113** ICO website: <u>https://www.ico.org.uk</u>