

## PRIVACY POLICY

### Fair Processing (Privacy) of Personal Data Notice Your Information, Your Rights

Being transparent and providing accessible information to patients/service users about how we will use your personal information is a key element of the Data Protection Act 1998 and the EU General Data Protection Regulations (GDPR).

The following notice reminds you of your rights in respect of the above legislation and how this clinic will use your information for lawful purposes to deliver your care and fulfil our legal obligations.

This notice reflects how we use information for:

- The management of patient records;
- Communication concerning your clinical care;
- Ensuring the quality of your care and the best clinical outcomes are achieved through clinical audit and retrospective review.

### Data Controller

As your registered private menopause specialist, we are the data controller for any personal data that we hold about you.

### What information do we collect and use?

All personal data must be processed fairly and lawfully, whether it is received directly from you or from a third party in relation to your care.

We will collect the following types of information from you or about you from a third party (provider organisation) engaged in the delivery of your care:

- ‘Personal data’ meaning any information relating to an individual that can be directly or indirectly identified from the data. This includes, but is not limited to, name, date of birth, address with postcode, telephone numbers and next of kin.
- ‘Sensitive data’ such as medical history including details of appointments and contact with you, medication, clinical notes, treatments, results of investigations, supportive care arrangements, social care status, race, ethnic origin.

Your healthcare records contain information about your health and any treatment or care you have received previously from us at IDA Clinic, but may also contain records from any health care provider that we have referred you to or that you have volunteered to give us to keep on file (e.g. from an acute hospital, NHS GP surgery, mental health care provider, physiotherapist). These records will be in electronic format, we do not keep paper copies of medical data at this clinic.

We use a combination of technologies and working practices to ensure that we keep your information secure and confidential.

### Why do we collect this information?

As we are a private menopause clinic and not an NHS practice we are not routinely required to provide information to the health service in England in order to review performance, services and research or education. However, we are required by law to notify the relevant authorities in the case of certain infectious diseases or very significant events that are in the interest of the public or vulnerable individuals. Information provided will always be anonymous whenever possible.

How do we use this information?

To ensure that you receive the best possible care, your records will be used to facilitate the care you receive. For example, recording medication allergies on the patient record will help to prevent the wrong medication being prescribed.

Information may also be used for internal clinical audits to monitor the quality of the service provided.

How is the information collected?

Your information will be collected initially via your registration form and a medical record created in your name on our electronic medical record. Your data is protected using state-of-the-art security, is fully backed up and highly encrypted. We use Semble to store your data.

Who will we share your information with?

We do not share your medical information with your NHS GP practice without your express consent, and unless this is required by statute or for compliance with the Good Medical Practice guide issued by the UK General Medical Council.

However, in order to deliver and coordinate your healthcare, we may share information with the following organisations only with your consent.

- Any private hospitals or clinics that you request us to refer you to.
- Your NHS GP Surgery if you request that we send them a copy of our records.
- Sub-contractors and other persons who help us to provide healthcare products and services to you;
- Companies and other persons including interpreters providing services to you as part of your extended care and post care follow-up
- Fraud prevention agencies, credit reference agencies, and debt collection agencies
- Government bodies and agencies
- Courts, to comply with legal requirements, and for the administration of justice.
- In an emergency or to otherwise protect your vital interests.
- To protect the security or integrity of our business operations and other patients.
- When we restructure or buy or sell our business or its assets or have a merger or re-organisation.
- Payment systems and providers; and
- Anyone else where we have your consent or as required by law.

Your information will only be shared if it is appropriate for the provision of your care or required to satisfy our statutory function and legal obligations. Your information will not be transferred outside of the European Union.

Who do we receive information from?

Whilst we might share your information with the above organisations, we may also receive information from them to ensure that your medical records are kept up to date and so that we can provide the appropriate care.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information that has been collected lawfully. Every member of staff who works for us has a legal obligation to keep information about you confidential. We maintain our duty of confidentiality by conducting annual training and awareness, ensuring access to personal data is limited to the appropriate staff and information is only shared with organisations and individuals that have a legitimate and legal basis for access.

Information is not held for longer than is necessary. We will hold your information in accordance with the Records Management Code of Practice for Health and Social Care 2016.

### Consent and Objections

The GDPR sets a high standard for consent. Consent means offering people genuine choice and control over how their data is used. When consent is used properly, it helps you build trust and enhance your reputation. However, consent is only one potential lawful basis for processing information. Therefore a clinic may not need to seek your explicit consent for every instance of processing and sharing your information, on the condition that the processing is carried out in accordance with this notice. IDA Clinic will contact you if we are required to share your information for any other purpose which is not mentioned within this notice. Your consent will be documented within your electronic patient record.

What will happen if I withhold my consent or raise an objection?

You have the right to write to withdraw your consent at any time for any instance of processing, provided consent is the legal basis for the processing. Please contact IDA Clinic via [info@journeyofawoman.co.uk](mailto:info@journeyofawoman.co.uk) for further information and to raise your objection.

### Your Right of Access to Your Records

The Data Protection Act 1998 and General Data Protection Regulations allows you to find out what information is held about you including information held within your medical records, either in electronic or physical format. This is known as the 'right of subject access'.

If you would like to have access to all or part of your records, you can make a request in writing to our email [info@idaclinic.co.uk](mailto:info@idaclinic.co.uk) or you may write to:

The Registered Manager

### Complaints regarding data

If you feel IDA Clinic has not complied with the current data protection legislation, either in responding to your request or in our general processing of your personal information, please raise your concerns in the first instance by contacting [info@idaclinic.co.uk](mailto:info@idaclinic.co.uk)

If you remain dissatisfied with our response you can contact the Information Commissioner's Office.