

Ellan Vannin Chiropractic Limited

Privacy Notice

The Clinic will meet the requirements of applicable data protection legislation as well as our professional guidelines and requirements, in the collection and processing of your personal information.

Our Information Governance Lead and Data Controller is Mary Phillips.

This Privacy Notice is available on our website at www.evchiropractic.co.uk, at reception at our physical Clinic locations, and by email if you contact reception@evchiropractic.co.uk

What Personal Information Will We Hold?

We will collect and process:

- Your contact details (including your name, addresses, contact numbers, etc)
- Your date of birth
- Any information you let us know
- Information about your health – this type of information is categorised as ‘sensitive’.
- [anything else?]

What Happens If You Do Not Provide the Information That We Request?

If you do not provide the requested information, we may be unable to provide healthcare services to you.

How Will We Collect And Use Your Personal Information?

We will usually obtain your information from you when you join the Clinic, or when you subscribe to a mailing list. However, we may obtain your information from another person if you are referred to us.

Your information may be stored digitally (on password protected computers), or in hardcopy format (in locked filing cabinets). The Clinic premises are always locked and alarmed out of working hours. Access will be further restricted to specific categories of your information by role as appropriate. For example, practitioners will have full access to your health data in order to provide you with treatment; whereas reception staff will only have access to information required in order to organise practitioner diaries and coordinate appointments and reminders, but will not have access to your health data.

We do not engage in automated decision-making or profiling.

For What Lawful Purpose Will We Collect And Use Your Personal Information?

Principally, we will collect and use your information for the purpose of providing optimum healthcare to you.

The lawful basis for processing your sensitive personal data (including your health data) is that: *“Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of law, or pursuant to a contract with a health professional.”* We confirm that the data is processed under the responsibility of Dr [name] [qualification initials] who is subject to the obligation of professional secrecy under the rules established by the [name of chiropractic governing body] based in [name of country where governing body is based]. We also obtain consent for processing your sensitive personal data wherever possible.

Other purposes include:

- Where you give us consent;
- To provide complementary therapies that are complementary to our healthcare services to you;
- To provide products that are complementary to our healthcare services to you;
- To send you marketing information about our services and products;
- To meet our legal and regulatory obligations; including to carry out statistical and other analysis;
- [To participate in medical research. Your information will be anonymised.]
- To assess and improve our services and products, as well as for training and quality purposes to ensure that our services and business are well-managed;

- [Potentially, to negotiate the sale of the business/Clinic, provided that it is safeguarded by confidentiality confirmations;]

We have CCTV in operation to prevent crime. Our retention policy is to keep the images for 30 days before they are deleted. If a member of the public wish to see the images that we have recorded of them, we will provide these within 1 calendar month or the request unless these images contain other members of the public that are identifiable on these images. The person responsible for the CCTV images at EVCC is Mary Phillips.

Sharing Your Data With Others

We keep your personal information confidential.

We may refer to you to a third party practitioner for treatment. We will ensure that they are under comparable obligations of confidentiality.

Where we have a contract with a third party for them to process data on our behalf, we will ensure that there is a processing agreement in place and that they will be obliged to keep the information confidential. Examples of processors include our IT service providers (including medical records service provider), and accountants. Processors' access will be restricted to what is necessary to perform that particular processing.

From time to time we may engage a consultant to perform tasks which might give them access to your personal information. We will ensure that they are fully aware of how to treat your personal information appropriately, and ensure that they are under appropriate confidentiality obligations.

Retention Periods

The retention period for sensitive data for client records is a minimum of 9 years and may be longer for complex records in order to meet our legal obligations. The retention period for other personal information is [2] years after it was last used.

Your Rights

- **Right to be Informed** – this Privacy Notice refers;
- **Right of Access to Your Personal Information** – you may make a subject access request to us in writing. We will respond within 1 month. You will receive a copy of the personal information that we hold on you;
- **Right to Rectification** – To assist us in ensuring that your information is up-to-date, accurate and complete, please let us know if your personal information changes. We will correct and complete any incorrect or incomplete information;
- **Right to Request Erasure** – however please note that the Clinic may have a legal obligation or legitimate reason to retain your information; (for example, clinical records must be retained for certain periods);
- **Right to Object** – to us using your personal information for a specific purpose; (for example, for marketing);
- **Right to Restriction** – to request us to restrict the use your personal information whilst your objections or requests are being dealt with; (for example whilst we correct your information); including not erasing your information whilst you need it in relation to a legal claim;
- **Right to Withdraw Consent** – at any time;
- **Right to Data Portability** – in certain circumstances.

Exercising Your Rights, Comments, Suggestions, And Complaints

Please contact Dr Mary Phillips at the Clinic with a request, comment, suggestion or complaint about how we process your information. Please do so in writing, by email to drmary@evchiropractic.co.uk, or to our physical location at 44 Westmoreland Road, Douglas, IM1 4AN.

If you are unhappy with our response, or if you need any advice, you should contact the Isle of Man Information Commissioner's Office, which can investigate your claim and take action against anyone who has misused personal data. Details of how to make a complaint are available on their website.

We last updated this policy on 9th Dec 2019.