

## **PRIVACY POLICY**

### **PRIVACY NOTICE FOR WEBSITE USE**

We collect information in relation to your treatment, deal with your queries, guide and enhance your online experience, supply you with information in which you have expressed an interest and for record keeping. We are committed to protecting your privacy and will only use your information in accordance with the Data Protection Act 2018.

This policy governs the use by Belwell Dental or one of its subsidiaries or Affiliates (“we/us/our”) of your (“you/your/yourself”) data which is available to us in connection with your use of this website (the “Site”).

You have the option to elect not to receive marketing information (from us, our business partners or selected third parties) and to prevent exchange of the data collected with third parties.

By using the Site, you are deemed to have full knowledge of and accept this Privacy Policy. If you do not agree to be bound by the terms of this Privacy Policy, please do not use this website.

We reserve the right to alter this Privacy Policy at any time. Such alterations will be posted on the website.

At any time, you can change these options by requesting to edit your details by emailing as at [info@belwelldental.com](mailto:info@belwelldental.com)

### **DATA COLLECTED & PURPOSE OF COLLECTION**

When you register as a patient or enquire about treatments with Belwell Dental, we may request to collect your name, address, telephone number, e-mail address, username, and password. This provides us with default details for your patient profile and records and sets up security so that your details are password protected.

Should you transact on the website (for example, make a payment to secure an appointment) we may allocate you a customer number, capture transaction details, invoicing address, and credit card details to process and fulfil your request.

You acknowledge that the website uses services provided by third-party service providers and not by us (for example, online booking). You consent to us transferring your information to such third-party service providers for the purposes of dealing with your queries, orders and for record

keeping purposes.

When you enter credit card details, you are in communication over a secure link with the credit & debit card merchant system. It retains details of the credit card transaction. You must enter the details for each purchase for security reasons.

To assist you with promotions and marketing and to tailor our service to your needs, we will ask you for feedback about you and any products or treatments you may require. Supply of this information is optional and not mandatory. All this data will be stored so we can effectively meet your needs.

You are entitled to ask for a copy of the information held about you at any time by contacting us. You consent to us (and our representatives) disclosing information to third parties: (i) if we are under a duty to disclose or share your information in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and any other contract entered into with us, or to protect the rights, property, or safety of our patients, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction; and (ii) if we determine that such disclosure is necessary in connection with any investigation or complaint regarding your use of the Site.

## SECURITY

We do take data security very seriously and will use all reasonable endeavours to protect the integrity of the information you provide. The website has numerous security measures in place to protect the loss, misuse and alteration of information under our control, such as passwords and firewalls. We cannot, however, guarantee that these measures are, or will remain, adequate.

Access to your patient records and data is password protected. You must keep all passwords confidential and not disclose or share them with anyone. You are responsible for all activities that occur under your passwords. You must notify us in the event you know or suspect someone else knows your passwords. If we have reason to believe there is a breach of security or misuse of the Site, we may require you to change your passwords or we may suspend your account without notice.

Our website may, from time to time, contain links to and from other websites. If you follow a link

to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check such policies before submitting any information to these websites.

Credit card details are processed by a secure server.

## PRIVACY NOTICE FOR OUR PATIENTS/SERVICE

### USERS

#### HOW WE USE AND SHARE YOUR INFORMATION TO HELP YOU

We need to keep a record of the care you receive to ensure that:

- Professionals involved in your care have accurate and up-to-date information
- We have all the information necessary for assessing your needs and providing excellent care
- Your concerns can be properly investigated if you raise a complaint
- Accurate information about you is available if you:
  - Move to another area
  - Need to use another service
  - See a different healthcare professional.

#### YOUR RECORD

We have a duty to:

- Maintain full and accurate records of the care we provide to you
- Ensure that your records are confidential, secure, and accurate
- Provide a copy at your request that is an accessible format (e.g. in large type if you are partially sighted). Please note that a fee may apply.
- Your record may include some or all the following:
  - Your name, address, and date of birth
  - Your email address and telephone number
  - Contacts we have had with you, such as appointments
  - Notes and reports on your health
  - Details of treatment and care, images, and test results

- Information on medicines, side effects and allergies
- Relevant information from people who care for you and know you well, such as health professionals and relatives.
- The staff who see you may also add notes on their professional opinion.
- If you wish us to, and it is practical, we will discuss and agree with you what we are going to enter on your record and show you what we have recorded.

#### IDENTIFYING YOU AS AN INDIVIDUAL

We have many patients/service users with similar names so it is vitally important for all patients/service users to be properly identified as individuals. To be sure that you have been correctly identified we may ask you for a number of pieces of information. Suitable items include:

- Full name
- Date of birth
- Passport as photo ID
- Driving licence as photo ID
- Permanent home (not temporary) address
- Email address
- Contact number

#### HOW YOU CAN HELP US TO KEEP YOUR HEALTH RECORD

##### ACCURATE

- Let us know when you change address, telephone number or name
- Tell us if any information in your record is incorrect
- Give your consent so that we can share information about you with other health professionals to make sure you receive the right healthcare
- Tell us if you change your mind about how we share the information in your record.

#### HOW WE USE YOUR CONTACT DETAILS

We take your privacy seriously so please let us know how you want us to contact you.

- Telephone

It is important for us to have a valid contact number for you. We may ring, leave a message or text you with information relevant to your treatment such as appointment confirmation,

pre-care advice and post-treatment follow-up. Please let us know if you do not wish to be contacted by telephone.

- Email
- It is important for us to have a valid email address for you. We use this to send information relevant to your treatment such as appointment confirmation, pre-care information and aftercare advice.
- We may also use your email to send you a regular newsletter about the clinic and our services; however, you can opt out of this if you do not wish to receive this.
- Please read the following before providing us with your email address.
- Emails can be quick and convenient and will allow you to keep a record (unlike a phone call). However, although our own systems are secure, it may be possible to
- intercept your email when it is being sent over the internet.
- Be aware also that if you share your computer others may read your emails.
- You could use email to contact staff in relation to a query or to ask about an appointment.
- Do not give more personal information than we need to process your request.
- Do not ask us to send you medical details that you would not want seen by other people.

If you have an urgent question or feel unwell after going home after treatment contact the clinic on +44 121 308 3273. If you have an emergency, please use the 111 NHS emergency service or 999 for life threatening conditions by telephone.

#### HOW YOUR RECORDS ARE KEPT

Our guiding principle is that we hold your records in strict confidence, ensuring that the following eight principles governing the processing of personal data are observed;

- personal data shall be processed fairly and lawfully;
- personal data shall be obtained only for specified and lawful purposes, and shall not be processed in any manner incompatible with those purposes;
- personal data shall be adequate, relevant and not excessive in relation to the purposes for which it is processed;
- personal data shall be accurate and, where necessary, kept up to date;

- personal data shall be kept for no longer than is necessary for the purposes for which it is processed;
  - personal data shall be processed in accordance with the rights of data subjects under the Act;
  - personal data shall be subject to appropriate technical and organisational measures to protect against unauthorised or unlawful processing and accidental loss, destruction or damage;
  - personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of data protection
- Information about you and the services you receive may be held in several formats and will be kept for the specific retention periods outlined by the relevant professional bodies. We use secure electronic systems to store user records, images, and details of prescriptions. Patient data held on paper or disk will be processed in accordance with the Data Protection Act and destroyed using secure documented procedures after the time periods set out by the Department of Health.

#### HOW YOUR RECORDS ARE USED

We use your records to:

- Ensure that any treatment or advisory services we provide to you are based on accurate information.
- Send a letter about your care to your GP or other health professional at the end of your treatment, unless you tell us not to do so.
- Work effectively with other services providing you with treatment or advice.
- Monitor the quality of our care and help us to understand the outcomes of care.
- Investigate any concerns or complaints you or your family have about your health care.
- Provide information that is needed for financial transactions in relation to payment for treatment, such as billing. For private patients/service users this may include details shared with your insurance company. If you have any concerns about this, please contact your insurer.

#### ANONYMISED DATA

We may remove your name and other details that could identify you so that we can use the information in your record anonymously to:

- Monitor and improve the quality of care received by patients/service users
- Protect the health of the general public, for example we may share anonymous and aggregated patient information with organisations such as the National Institute for Clinical Excellence and the Cancer Registry for research or statistical purposes
- Train and educate staff.

Wherever possible, we anonymise your data or use a quasi- identifier such as a patient number.

#### SHARING YOUR HEALTH RECORD

To make sure you receive all the care and treatment you need, we may need to share the information in your health record with other staff and organisations. This could include:

- Other healthcare professionals, such as doctors, pharmacists, and pathology and radiology staff involved in the analysis and reporting of diagnostic tests
- Other hospitals and private sector organisations involved in your care
- Local authority departments
- Voluntary organisations providing on-going support
- Administrative support staff

Note that anyone who receives information from us also has a legal duty to keep it confidential.

We may also share information that identifies you where:

- You ask us to do so
- We ask for specific permission and you agree to this
- We are required to do this by law
- We have special permission because we believe that the reasons for sharing are so important that they override our obligation of confidentiality (e.g. to prevent someone from being seriously harmed).
- We do not give the names and addresses of patients/service users to other organisations except under the circumstances described in this Privacy Notice. Unless you have signed an additional consent, we will not contact you after your visit for purposes other than:
  - Follow up of care

- Collecting your views about your stay with us
- Settlement of any account that may be due, if appropriate
- Complaints and concerns handling.

#### SPECIAL SITUATIONS

Sometimes we have a legal duty to provide information about people; examples are reporting some infectious diseases, and when a court order instructs us to do so. Records may also be shared without the patient's consent in exceptional situations, such as to safeguard adults or children.

#### SHARING YOUR RECORDS OUTSIDE THE EU

If your permanent address is outside the EU, or your treatment is continuing outside the EU, we may send details of your treatment to individuals based outside the EU specifically to promote your ongoing care. This would normally be the doctor who referred you to us for treatment. If you wish, we can give you the documents so that you have physical control over this information.

In the usual course of our business, we may use third parties to process and store your data on our behalf. We normally store your data on secure servers in the European Economic Area (EEA). Such processing is subject to contractual restrictions with regard to confidentiality and security in addition to the obligations imposed by the Data Protection Act 1998.

Exceptionally we may make use of our suppliers who are based outside the EEA for processing and storing your data. We have strict controls over how and why your data can be accessed. By submitting your personal data, you agree to this.

Where necessary we may transfer personal information overseas for processing to support the long-term effectiveness of treatment and monitor patient outcomes. Personal information will be processed in this way where it is not possible to achieve this purpose with the use of anonymised or pseudonymised information only.

#### HOW CAN I STOP MY INFORMATION FROM BEING SHARED?

We act to provide information principally for other health and social care professionals who have requested this since they require further detailed investigations on their patients/service users.

So naturally we will normally need to share this information with your doctor who has referred you to our service.



If you do not want us to share your information with your GP, other healthcare providers or carers, please tell the team looking after you. But please note that not sharing your information may affect the care that can be provided for you.

You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. Where your wishes cannot be followed you will be told the reasons including the legal basis. You may at any time withdraw any consent you have previously given to us to process information about you.

If you wish to exercise your right to opt-out, withdraw consent to use your information, or to speak to somebody to understand what impact this may have, please discuss your concerns with your professional, or by emailing us at [info@belwelldental.com](mailto:info@belwelldental.com) with 'Opt Out Request' in the subject line of the email.

#### YOUR LEGAL RIGHTS

We are a Data Controller of the data we hold about our patients/service users and staff.

You have the right to confidentiality under the Data Protection Act 2018 (DPA), the Human Rights Act 1998 and the Common Law Duty of Confidentiality. The Equality Act 2010 may also apply.

You have the right to know what information we hold about you, what we use it for and if the information is to be shared, who it will be shared with.

You have the right to apply for access to the information we hold about you. Other people can also apply to access your health records on your behalf. These include anyone authorised by you in writing (such as a solicitor), or any person appointed by a court to manage your affairs where you cannot manage them yourself. Access covers:

- The right to obtain a copy of your record in permanent form;
- The right to have the information provided to you in a way you can understand, and explained where necessary, for example where abbreviations have been used. You would not be entitled to see information that:

- Has been provided about you by someone else if they haven't given permission for you to see it

- Identifies another person who has not given permission for you to see the information about them

- Relates to criminal offences
- Is being used to detect or prevent crime
- Could cause physical or mental harm to you or someone else. If you are currently receiving services from us and wish to view the record without obtaining a copy, discuss your request with the professional in charge of your care.

#### OBTAINING A COPY OF YOUR RECORD

If you wish to apply for access to the information, we hold about you:

- You should send your request in writing to us.
- You should provide enough information to enable us to correctly identify your records, for example include your full name, address, date of birth, any unique identifier number.
- We will take every reasonable step respond to you within 40 days of receiving your request
- You may be required to provide a form of ID before any information is released to you.

Once you receive your records, if you believe any information is inaccurate or incorrect, please inform us.

In any request, to cover the cost of the administration involved, we may request a fee.

This Privacy Policy is effective immediately and will remain in effect until further notice.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

#### CHAPERONE POLICY

Belwell Dental are committed to providing a safe, comfortable environment where patients and staff can be confident that best practice is always being followed and the safety of everyone is of paramount importance.

We recommend that all patients are seen at some point during the consultation process alone with our clinician, to ensure patients are free to express any concerns or worries in their own words and without fear of coercion or threat from any accompanying individual. However, all patients are entitled to have a chaperone present for any consultation, examination, or procedure where they feel one is required.

Regardless of gender of the patient or clinician, you will be offered the option of having an impartial observer (chaperone) present for any intimate examination. Our trained staff routinely undertake this role and will:

- Be sensitive and respect your dignity and confidentiality
- Reassure you in the event of distress or discomfort
- Be familiar with the procedures involved
- Stay for the whole examination and be able to see what the clinician is doing, if practical
- Be prepared to raise concerns if they are concerned about the clinician's behaviour or actions.

Your healthcare professional may also require and request a chaperone to be present for certain consultations in accordance with our chaperone policy.

#### FURTHER QUESTIONS

If you have any further questions about this Privacy Policy, or if anything is not clear, please let us know by emailing our team at <mailto:info@belwelldental.co>