



PATIENT PRIVACY NOTICE



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PATIENT PRIVACY NOTICE

This document sets out Pure Dental's practice policy on the protection of information relating to our patients. Protecting the confidentiality and integrity of personal data is a critical responsibility that the practice takes seriously at all times.

The Practice will ensure that data is always processed in accordance with the provisions of relevant data protection legislation, including the General Data Protection Regulation (GDPR).

Pure Dental is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you as a patient. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former patients of Pure Dental. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. A copy of the full GDPR Policy and Procedure is available for review from Pure Dental.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- ① Used lawfully, fairly and in a transparent way.
- ② Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- ③ Relevant to the purposes we have told you about and limited only to those purposes.
- ④ Accurate and kept up to date.
- ⑤ Kept only as long as necessary for the purposes we have told you about.
- ⑥ Kept securely.

WHAT INFORMATION DO WE HOLD ABOUT YOU?

To provide you with a high standard of dental care and attention, we need to hold personal information about you. This personal data includes:

- Your past and current medical and dental condition including tooth charting; personal details such as your title, name, date of birth, gender, address, telephone number, email address, your general medical practitioner, your next of kin phone number in case of medical emergency
- Family members, and previous dental practitioners
- Date registered at the practice
- Information that the individual is or has been a patient of Pure Dental or has attended, cancelled or failed to attend an appointment on a certain day
- Radiographs, clinical photographs and study models of your teeth
- Information about the treatment that we have provided in the past or propose to provide to you and its cost
- Notes of conversations/incidents about your care, for which a record needs to be kept
- Records of consent to treatment
- Correspondence with other health care professionals relating to you, for example in the hospital or community dental services

This list is not exhaustive.



HOW IS YOUR PERSONAL INFORMATION COLLECTED?

The information we hold about you is collected when you engage with us (such as whilst you are at the practice, over the telephone (including our personal telephone answering service) or through website/email/online contact forms. This information may also come from 3rd parties such as referring dentists/ doctors and hospitals.

WHY WE HOLD THIS INFORMATION?

Dental professionals are compelled by law to produce and maintain adequate patient records in order to provide continuity of care to our patients, this allows us to deliver and follow up quality patient care. Detailed information that is kept in your dental records is essential for the practicing dentist to have, as it not only has a forensic application, but also a legal implication with respect to insurance and consumerism. For security and to prevent and detect crime, we use CCTV outside the practice to monitor and collect images only.

HOW DO WE PROCESS AND STORE THE DATA?

We will process and store personal data that we hold about you in the following way:

RETAINING INFORMATION. We will retain your dental records while you are a patient and after you cease to be a patient, for at least eleven years or, for children, until age 25, whichever is the longer amount of time. All digital information will be stored on our dental software indefinitely as 'inactive' if you have not had an appointment in the last 3 years. All paper forms that hold personal information are scanned on to your personal file on the dental software that we use, the paper records are then shredded through our off-site personal data collection company 'Shred-It'. To reduce the amount of paper forms, where possible we use Clinipads within the practice to obtain your information.

SECURITY AND STORAGE OF INFORMATION. We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information by other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. We have implemented procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Personal data about you is held on the practice's computer system. The information is not accessible to the public; only authorised members of staff have access to it. Our computer systems are password protected and every user of our dental software has their own personal login and passwords are changed monthly. When the computer stations are not in use all computers are screen locked and require a password to obtain access. We back-up our stored information routinely, this includes an off-site backup to a cloud server which is carried out for security reasons in case of fire. The server is password protected with double authentication and can only be accessed remotely by management and our I.T consultants. We will keep your information confidential at all times but we may share it with the following 3rd parties which include laboratory technicians, referring dentists, our I.T consultants, dental software engineers, telephone answering service, personal data shredding company and Braemar finance if a patient requests to finance their dental treatment. Your personal information will not be provided to any 3rd party without obtaining your written consent first.

Third parties who require access to personal data also take GDPR seriously and have taken their own precautions to keep this data secure in line with our policies. We do not allow our third party providers to use your personal data for their own purposes. We only permit them to process your personal data for a specified purpose and in accordance with our instruction. Our 3rd parties will never send marketing information to you and would only contact you with your prior consent if necessary. All paper records and card receipts are stored in lockable and fire proof filing cabinets.

ACTIVITY REQUIRING YOUR DATA	LAWFUL BASIS FOR PROCESSING DATA
Carry out the registration with Pure Dental using your name, contact details, Date of birth, gender, marital status, next of kin, Doctors contact details, family members	Legal obligation/Legitimate interests/ Performance of contract
Dental record including medical history, photos, radiographs, study models, treatment plans, CT scans, lab tickets, referrals, consents, prescriptions, finance agreements	Legal obligation/Legitimate interests/ Performance of contract
CCTV Footage	Legal obligation/Legitimate interests/ Practice Safety
Health Plan Details	Legal obligation/Legitimate interests
Reviews/Feedback	Legal obligation/Performance of contract/legitimate interest
Notes on telephone/email conversations	Legal obligation/Performance of contract/legitimate interest
PDQ card receipts	Legal obligation/Performance of contract/legitimate interest

HOW DO WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION?

“Special categories” or particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have an appropriate policy document in place which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- ① In limited circumstances, with your explicit consent
- ② Where we need to carry out our legal obligations or exercise rights in connection with providing our services.

SENSITIVE INFORMATION WE MAY HOLD ABOUT YOU INCLUDES:

- Details regarding your personal identification such as your physical condition. This includes x-ray imaging, genetic and biometric data.
- Information concerning your medical history, including physical and/or mental condition and your oral health or condition.

- Information about discussions undertaken and agreements reached on treatment options, including costs of any proposed treatment.
- Information about the treatment that is planned, is being undertaken or has been provided.
- Information about family members and personal circumstances supplied by you or others.
- The amount that was paid for treatment, the amount owing, or the fact that the patient is a debtor to Pure Dental.

ONLINE CONTACT

All emails sent with personal information are encrypted with a password and are only accessible to the practice and the receiver, the password is never shared within the email.

Our website holds our privacy policy and we may use cookies and similar technologies on our website and in our emails. Cookies are very small text files that may be stored on your computer or mobile device when you visit a website, enable images, or click on a link in an email. These technologies do many different things, such as letting you navigate between web pages efficiently and remembering your preferences. In emails they help us to understand whether or not you have opened the email and how you have interacted with it. Our website gives you more information on these technologies, how and where we use them and how you can control them.



DISCLOSURE OF INFORMATION

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
- HM Revenue and Customs
- GDC and CQC
- The police/ fraud prevention agencies/ your insurance companies
- Private dental schemes of which you are a member (Practice Plan or personal insurance)

Disclosure of your personal information to the above will only take place on a 'need-to-know' basis in order to provide care to you - your consent will be obtained prior to your information being given. Only the information that the recipient needs to know will be disclosed and this will only occur when we have your specific consent. If patient specific information is transferred electronically, documents are encrypted and the password for which is given verbally via telephone call.

In very limited circumstances or when required by law or a court order, personal data may be disclosed to a third party not connected with your health care without your prior consent. In all other situations, disclosure that is not covered by this Code of Practice will only occur when we have your specific consent.

We may share your personal information with other 3rd parties for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing dentistry services or providing any other associated benefit), or we may be prevented from complying with our legal obligations (such as health and safety).



YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

CHANGE OF PURPOSE

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

DO WE NEED YOUR CONSENT?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of health and safety law.

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

YOUR RIGHTS

You have the right to confidentiality under the General Data Protection Regulations (GDPR). You have the right to know what personal information we hold about you, what we use it for and who it is shared with.

YOUR RIGHTS INCLUDE:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party.

If you want to: review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Laura Ring at Pure Dental in writing.

Apply for access to the personal information that we hold about you, this includes:

- The right to obtain your records
- The right to have your personal information explained to you in detail (for example any dental abbreviations you do not understand).

If you do not wish the personal information that we hold about you to be used or shared in the way that is described in this leaflet, please discuss this with us either in person or in writing. You have the right to object, but please be aware that this may affect our ability to provide you with our utmost care and advice.

NO FEE REQUIRED

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent please contact Laura Ring at Pure Dental in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

REMOVAL OF INFORMATION

When removal of personal information is required, it will be removed securely and confidentially by method of our confidential waste company 'Shred-It' for all paper documentation and deleted from the server for all digital dental records.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

