



PRIVACY NOTICE

Updated 16 November 2020

Welcome to Priory Dental's privacy policy.

Dr Ryan Hughes trading as Priory Dental ("Priory Dental") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our Site (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. **Purpose of this privacy policy**
2. **The data we collect about you**
3. **How is your personal data collected?**
4. **How we use your personal data**
5. **Disclosures of your personal data**
6. **International transfers**
7. **Data security**
8. **Data retention**
9. **Your legal rights**
10. **Comments, suggestions and complaints**
11. **Data Opt-Out Policy**
12. **Glossary**

1 **Purpose of this privacy policy**

This privacy policy aims to give you information on how Priory Dental collects and processes your personal data through your use of this Site, including any data you may provide through this Site when you download our publication or request an appointment or use our contact us form and how it meets the requirements of the Data Protection Act 2018, the General Data Protection Regulation ((EU) 2016/679) ("GDPR"), the guidelines on the Information Commissioner's website as well as our professional guidelines and requirements.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Dr Ryan Hughes trading as Priory Dental is the controller and responsible for your personal data (collectively referred to as "Priory Dental", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

- (a) Full name: Dr R Hughes
- (b) Email address: askus@priorydental.com
- (c) Address: 29 Priory Road, Wells, Somerset BA5 1SU

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

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

Third-party links

This Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Site, we encourage you to read the privacy policy of every website you visit.

2 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (a) Identity Data includes first name, maiden name, last name, marital status, title, date of birth and gender, NHS number for the provision of your dental health care.
- (b) Contact Data includes postal address, email address and telephone numbers for the purposes of providing treatment plans, recall appointments, reminders or estimates.
- (c) Financial Data includes payment card details, details of the fees we have charged, payments exemptions (NHS), the amounts you have paid and some payment details.
- (d) Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- (e) Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this Site.
- (f) Special Category Data including health records for the purpose of delivery of health care and meeting our legal obligations, including medical and dental history, clinical records made by dentists and other dental professionals involved with your care,

treatment X-rays, clinical photographs, digital scans of your mouth and teeth, study models, treatment plans and consent, notes of conversations with you about your care, correspondence from other health professionals or institutions involved in your care, feedback and complaints.

- (g) Usage Data includes information about how you use our Site.
- (h) Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you..

3 How is your personal data collected?

We use different methods to collect data from and about you including through:

- (a) **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms at the practice or on our Site or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - (i) make use of our services
 - (ii) subscribe to our newsletter or any other marketing communications;
 - (iii) enter a survey; or
 - (iv) give us feedback or contact us.
- (b) **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out:

Technical Data from the following parties:

- (i) analytics providers;
- (ii) advertising networks; and
- (iii) search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the UK.

4 How we use your personal data

We will only use your personal data when the law allows us to and we will never pass your personal data to a third party. Most commonly, we will use your personal data in the following circumstances:

- (a) To provide you with the dental care and treatment that you need, we require up-to-date and accurate information about you.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal obligation.
- (d) We will seek your preference for how we contact you about your dental care. Our usual methods are SMS, telephone, email or letter.
- (e) We may contact you to conduct patient surveys or to find out if you are happy with the treatment you received for quality control purposes.
- (f) We may use your information for our own analysis to understand the effectiveness of our marketing activities.

If we intend to refer a patient to another practitioner or to secondary care such as a hospital we will ask for the individual's permission before the referral is made and the personal data is shared. Your data will be shared with the NHS in England, if you are having NHS treatment.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new patient	a) Identity b) Contact c) Special Category Data	a) Necessary for our legitimate interests b) Performance of a contract with you c) Necessary for health care purposes d) Necessary to comply with a legal obligation e) Necessary for identifying or keeping under review the existence or absence of equality or treatment between groups of people with the view to enabling such equality to be promoted or maintained
To maintain your contemporaneous clinical records and send your data to the General Data Council or other authority as required by law	a) Identity b) Contact c) Special Category Data	a) Necessary for our legitimate interests b) Necessary for health care purposes c) Performance of a contract with you d) Necessary to comply with a legal obligation e) Necessary for identifying or keeping under review the existence or absence of equality or treatment between groups of people with the view to enabling such equality to be promoted or maintained
To manage your NHS dental care treatments	a) Identity b) Contact c) Special Category Data	a) Necessary for our legitimate interests b) Necessary for health care purposes c) Performance of a contract with you d) Necessary to comply with a legal obligation e) Necessary for identifying or keeping under review the existence or absence of equality or treatment between groups of people with the view to enabling such equality to be promoted or maintained
To deliver services to you including: a) Manage payments, fees and charges b) Collect and recover money owed to us	a) Identity b) Contact c) Financial d) Transaction	a) Performance of a contract with you b) Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which will include: a) Communicating with you as and when required including appointment reminders, treatment plans, estimates and other communications about your treatment or the practice b) Communicating with your next of kin in an emergency c) If a parent or carer communicating with you about the person you parent or care for d) Referring you to other dentists, doctors and health professionals as required e) Notifying you about changes to our terms of business or privacy policy f) Asking you to leave a review or take a survey	a) Identity b) Contact c) Profile d) Marketing and Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests
To enable you to complete a survey	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications	a) Performance of a contract with you b) Necessary for our legitimate interests
To administer and protect our business and our Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests b) Necessary to comply with a legal obligation
To use data analytics to improve our Site, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	a) Necessary for our legitimate interests (to define types of customers for our services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To continually improve the care and service you receive from us	a) Identity b) Contact c) Profile d) Marketing and Communications	a) Necessary for our legitimate interests
To obtain criminal record disclosures for team member	a) Identity b) Contact c) Special Category Data	a) Necessary for our legitimate interests b) Necessary to comply with a legal obligation

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, product/service experience or other transactions.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law..

5 Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- (a) Your doctor
- (b) The hospital or community dental services or other health professionals caring for you
- (c) Dental laboratories or other dental practices
- (d) NHS payment authorities
- (e) The Department for Work and Pensions and its agencies, where you are claiming exemption or remission from NHS charges
- (f) Private dental schemes of which you are a member
- (g) Debt collection companies
- (h) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We also share your information with third parties in order to deliver the following services to you:

- (a) Managing new enquiries from our Site
- (b) Contacting you to check if you wish to remain a patient of Priory Dental
- (c) Sending reminders for your dental appointments
- (d) Processing booking appointments
- (e) Collecting feedback from our patients
- (f) Managing email communications to our patients
- (g) Providing troubleshooting and support services for our various IT systems.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. In certain circumstances or if required by law, we may need to disclose your information to a third party not connected with your health care, including HMRC or other law enforcement or government agencies.

6 International transfers

We do not transfer your personal data outside the European Economic Area ("EEA"). Some of your information may be transferred out of the EEA, primarily for creating medical devices such as crowns. Where information is transferred outside of the EEA, we require that appropriate safeguards are in place and we use contracts that require the recipient to protect your personal data to the same standards as it would be within the EEA..

7 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8 Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our Record Retention Policy available from the practice.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for two years after it was last processed. The retention period for special data in patient records is a minimum of 10 years and may be longer for complex records or to meet our legal requirements.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- (a) [Request access to your personal data](#)
- (b) [Request correction of the personal data](#)
- (c) [Object to processing of your personal data](#)

- (d) [Request restriction of processing of your personal data](#)
- (e) [Request the transfer of your personal data](#)
- (f) [Right to withdraw consent at any time](#)

Further details of these rights can be seen in our Information Governance Procedure available at the practice or at the [Information Commissioner's website](#). If you wish to exercise any of the rights set out above, please contact us.

If you are a patient of the practice, you have the right to withdraw consent for important notifications, newsletters, surveys or marking. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month.

If you are not a patient of the practice you have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text.

We may charge a reasonable fee if your request is made one month after your request to withdraw your consent or if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10 Comments, suggestions and complaints

Please contact our DPO for a comment, suggestion or a complaint about your data processing at askus@priorydental.com, or by calling 01749 678040 or by writing to us at 29 Priory Road, Wells, Somerset BA5 3HU. We take complaints very seriously.

If you are unhappy with our response or if you need any advice, you should contact the ICO. The telephone number is 0303 123 1113, you can also [chat online with an advisor](#). The ICO can investigate your claim and take action against anyone who has misused your personal data. You can also visit their website for information on [how to make a data protection complaint](#).

11 Data Opt-Out Policy

How the NHS and care services use your information

Priory Dental is one of many organisations working in the health and care system to improve care for patients and the public. Whenever you use a health or care services, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatments. The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- (a) Improving the quality and standards of care provided
- (b) Research into the development of new treatments
- (c) Preventing illness and diseases
- (d) Monitoring safety
- (e) Planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is only used when permitted by law.

Anonymised data is used for research and planning so you cannot be identified in which case, your confidential patient information is not needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care. To find out more or to register your choice to opt out, please visit [the NHS website](#) where you will:

- (a) See What is meant by confidential patient information
- (b) Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- (c) Find out more about the benefits of sharing data
- (d) Understand more about who uses the data
- (e) Find out how your data is protected
- (f) Be able to access the system to view, set or change your opt-out
- (g) See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

- (a) <https://www.hra.nhs.uk/information-about-patients/>(which covers health and care research);
- (b) <https://understandingpatientdata.org.uk/introducing-patient-data>(which covers how and why patient information is used, the safeguards and how decisions are made).

You can change your mind about your choice at any time by opting out [here](#).

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this with your express agreement.

Our practice only uses your personal health data to provide individualised care to you and does not disclose your data for any other purposes, The national data opt-out does not apply to our usage of your data and we are compliant with the policy.

12 Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

- (a) **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- (b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- (d) **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- (e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (i) If you want us to establish the data's accuracy.
 - (ii) Where our use of the data is unlawful but you do not want us to erase it.
 - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- (f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- (g) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.