



PRIORY DENTAL PRIVACY POLICY

Last updated: 3 September 2025

1. Who we are

Priory Dental is a mixed NHS and private dental practice.

- **Data Controller:** Priory Dental Limited, 29 Priory Road, Wells, Somerset BA5 1SU
- **Company number:** 12693996
- **Data Protection Lead:** The person responsible for overseeing data protection compliance and handling queries about this notice.
- **Contact:** askus@priorydental.com | 01749 678040

We are registered with the Information Commissioner's Office (ICO) and comply with the NHS Data Security and Protection Toolkit.

2. What data we collect

We may collect and use:

- **Identity & Contact:** name, address, date of birth, gender, NHS number, phone, email
- **Health Records (special category data):** medical/dental history, clinical notes, X-rays, scans, photos, treatment plans, referrals, lab results
- **Financial:** payments, exemptions, insurance claims, NHS patient charge revenue
- **Communication Preferences:** your choices for reminders and contact methods
- **Website/Technical:** IP address, browser type, and cookie data (see Section 9).

3. Why we collect your data

Purpose	Data Used	Lawful Basis (art. 6 UK GDPR)	Special Category (Art. 9 UK GDPR)
NHS patient care	Identity, health records, NHS number, contact	Public Task (Art. 6(1)(e))	Health/Social Care (Art. 9(2)(h), DPA 2018 Sch.1, Pt.1)
Private patient care	Identity, health records, contact	Contract (Art. 6(1)(b))	Health/Social Care (Art. 9(2)(h))
Clinical governance & legal duties (CQC, GDC, NHS England reporting, safeguarding)	Health, identity, contact	Legal obligation (Art. 6(1)(c))	Health/Social Care (Art. 9(2)(h))
Appointment reminders & recalls	Identity, contact	Legitimate Interests (Art. 6(1)(f))	N/A
Referrals (labs, specialists, imaging)	Health, identity, contact	Contract/Public Task (as applicable)	Health/Social Care (Art. 9(2)(h))
Marketing private services	Identity, contact, preferences	Consent (Art. 6(1)(a))	N/A
Website video cookies (YouTube)	Technical, usage	Consent (Art. 6(1)(a))	N/A

4. How we use and share your Data

We share information only where necessary for your care or as required by law. Typical sharing includes:

- NHS England / NHS Business Services Authority (NHS patients)
- Dental labs, imaging providers, referral specialists
- Your GP or hospital clinicians (where relevant)
- IT system providers (secure, UK/EU-based)
- HMRC or regulators if legally required

We do not share your data with insurers, marketers or third parties without your express consent.

5. Your rights to your Data

You have the right to:

- Access a copy of your records within 1 month
- Correction if inaccurate/incomplete
- Restriction in certain circumstances
- Objection to non-essential uses (e.g. marketing)
- Data portability (for electronic data you provided)
- Erasure (except where health records must be retained by law)
- Withdraw consent (for marketing or cookies at any time)

For NHS patients, some rights (e.g. erasure) may not apply where records must be retained under NHS rules.

6. How long we keep records

- **NHS patients:** minimum **10 years after last treatment** (or until age 25 if treated as a child), in line with NHS guidance
- **Private patients:** minimum **10 years** in line with GDC and CQC standards
- **Financial/payment records:** **6 years** (HMRC requirement)

7. How we keep your Data safe

- Clinical software compliant with **NHS DSP Toolkit**
- Role-based staff access, encryption, confidentiality agreements
- Secure backups and locked paper records
- Data breach response in line with ICO's 72-hour rule

8. NHS National Data Opt-Out

NHS patient data may also be used for research and planning beyond direct care. You may choose to opt out via www.nhs.uk/your-nhs-data-matters. We respect and apply your preferences.

9. Cookies

Our website uses cookies to make the site work and to provide video content.

- **Essential cookies** – required for the site to function (e.g. WordPress session cookies). Always active.
- **YouTube cookies** – if you play an embedded YouTube video, YouTube may place cookies on your device to remember settings and track usage. These are **not essential** and only load if you give consent.

When you first visit our site, you will be asked if you consent to non-essential cookies. You can change your cookie preferences at any time via your browser.

10. Accessibility

This Privacy Notice is available in **large print, easy read, or alternative languages** on request, in line with the **Equality Act 2010**.

11. Complaints

If you have concerns, please contact us first:

 askus@priorydental.com

 01749 678040

If you remain unhappy, you can contact the **Information Commissioner's Office**: www.ico.org.uk / 0303 123 1113

We may update this privacy policy from time to time. The latest version of the privacy policy will be posted on our website.