



# 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](mailto: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.

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## 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).
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## 3. Why we collect your data

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

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## 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)
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## 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
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## 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](http://www.nhs.uk/your-nhs-data-matters). We respect and apply your preferences.

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## 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.

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## 10. Accessibility


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

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## 11. Complaints

If you have concerns, please contact us first:

 [askus@priorydental.com](mailto:askus@priorydental.com)

 01749 678040

If you remain unhappy, you can contact the **Information Commissioner's Office**: [www.ico.org.uk](http://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.