

Huntly & Elgin Chiropractic Ltd. Privacy Policy

This practice is required to provide our patients with notice of our privacy policy with respect to protected personal information collected at our clinics or through our websites. The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

Our privacy policy is in accordance with the new GDPR regulations which come into force from 25th May 2018.

Who Are We?

We are Elgin and Huntly Chiropractic Ltd. For the purposes of processing your personal data, under the new GDPR regulations it is a requirement to appoint a 'Data Controller'. As the proprietor of both Huntly and Elgin clinics, Karin Robertson is referred to as the 'Data Controller'.

Lawful Basis for Processing Your Data

By attending our clinics or using our website, you consent to understanding and accepting the terms listed in this privacy policy. Our lawful basis for processing your data is one of consent. We reserve the right to update, amend, or change this Privacy Policy at any time to conform to new laws and regulations or changes in business standards.

What Data Do We Collect?

In order to provide the highest quality of care and comply with the General Chiropractic Council's Standards of Conduct, Performance and Ethics for Chiropractors (2016) we need to collect personal information about your health and lifestyle. Your request for an appointment and our agreement to provide our services constitutes a contract. You can choose not supply this information; however, the clinics and their staff would then not be able offer you care or any of their services. We have a 'Legitimate Interest' in gathering your information so that we can provide the best service possible, effectively and safely

We will never share your data with anyone who does not need access without your written consent

Only the following people/agencies will have routine access to your data:

- Your practitioner(s) in order that they can provide you with treatment
- Our reception staff, as they organise our practitioners' diaries, and coordinate appointments and reminders.
- Other administrative staff, such as our bookkeeper who will only access essential financial details e.g. payments made to the clinic
- We may periodically use hardware, such as an iPad to collect anonymised data about your experiences at the clinic, using CPAQ, an online questionnaire used by the Royal College of Chiropractors. This information includes your demographics, clinical outcomes and general feedback.

The anonymised data collected via CPAQ is processed by the Royal College of Chiropractors. This data can be used for activities such as monitoring patient outcomes, clinical audits and research.

The clinics may use Care Response to collect clinical outcomes. Care Response is run through a LTD company, Clinical Transparency. Data is encrypted and it is held until the patient's practitioner deletes it, this includes backups. Organisation Admin users will get a notification when they log in of any patient who has not updated their records (ie completed an assessment) for 7 years.

For data audit reasons it is not possible to delete a patient's record but their name, email and contact details can be changed to randomised text; this is effectively deleting patient details.

E-mails may be sent through 'Care Response', software which collects and processes clinical outcomes. Your permission along with your signature will be sought before entering any of your details into the system.

<https://support.care-response.com/legal-and-policies/>

Information Security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorised access to systems where we store personal data.

Your records may be stored:

- on paper in locked filing cabinets,
- and the offices are always locked out of hours
- on the clinic's computers.

Access to electronic data is password protected, and the passwords are changed regularly on our office computers. These backed up regularly, and the offices are locked out of working hours.

Information Sharing

As the Elgin and Huntly Chiropractic Clinics are located in two separate geographic areas patient information may be shared between the two practises. Examples of this include if a patient has an appointments at each of the clinics or if the clinic is attempting to contact a patient regarding their appointment at another practice.

Chiropractors are required to contact a patient's general practitioner or other healthcare professional if they believe it is clinically justified. An example may be a referral or an update regarding a patient's condition. A patient's consent will always be sought before their information is shared with other healthcare professionals.

We will never share your personal contact information to third parties without prior notice and consent, save for the rare circumstance that your personal data is requested by a government agency in relation to, for example, a crime or for reasons of national security or we believe that not doing so may put you or the general public at risk of significant harm.

Normally, we only use your personal e-mails to send appointment reminders/alterations and any matters relating to the management of your condition, in particular, exercise sheets or any lifestyle advice.

Legally chiropractors are obliged to maintain your records for 8 years after your most recent treatment (or until age 25 years, if this is longer). After this period, patient records are routinely destroyed.

Your Rights

As we process your personal data, you have certain rights. These are right of access, a right of rectification, a right of erasure and a right to restrict processing.

You may request a copy of your data at any time. Requests must be in writing or by email and addressed to the data controller, Karin Robertson. You must provide the following information: your name, address, telephone number, email address and

details of the information you require. In order to verify your identity a copy of formal identification such as a passport, driving license and/or a recent utility bill must be presented when applying to obtain personal information/data.

If you believe any of the personal data we hold on you is inaccurate or incomplete, please contact either clinic directly and any necessary corrections to your data will be made promptly.

If you believe we should erase your data, please contact the data controller, whose details are given below.

We may withhold such personal information to the extent permitted by law.

The clinics may, periodically, employ consultants to undertake tasks which might give them access to your personal data (but not your medical notes). We will ensure that they are fully aware that they must treat that information as confidential, and that they sign a non-disclosure agreement.

You have the right to see what personal data of yours we hold, and you can ask us to correct any factual errors.

Should your personal data that we control be lost, stolen or otherwise breached, where this constitutes a high risk to your rights and freedoms, we will contact you without delay. We will give you the contact details of the person who is dealing with the breach; explain to you the nature of the breach and the steps we are taking to deal with it.

Clinic Contact Details

Should you feel the necessity to complain about any aspect of the handling of your personal data then all complaints should be sent to Karin Robertson, chiropractor, info@huntlychiroclinic.co.uk (Huntly) **01466 792534** or info@elginchiroclinic.co.uk (Elgin) **01343 552721**

You can contact the ICO via their website: www.ico.org.uk should you wish to make a complaint about the way we are processing your personal data.

Please note that this Privacy Policy maybe updated periodically. While we expect the majority of alterations will be minor, we will post any Privacy Policy changes on our website.

Effective May 2018