

## PRIVACY NOTICE – PATIENTS

**Data controller:** European School of Osteopathy (“ESO”)  
Boxley House  
Maidstone  
Kent ME14 3DZ  
Tel. No. 01622 671558

### 1.0 INTRODUCTION

This Privacy Notice explains how we will collect and process personal data in respect of our patients who are treated at our clinic at Tonbridge Road.

The ESO is committed to being transparent about how it collects and uses that data and to meeting our data protection obligations under the General Data Protection Regulations (“GDPR”).

### 2.0 WHAT INFORMATION DO WE COLLECT AND HOW?

We collect relevant information about you in the course of you undergoing treatment with us in our clinic. Most of this information is provided by you directly, but some may also be provided by your doctor or any other medical practitioner involved in your care. This data includes:

- your name, address and contact details, including email address and telephone number, your date of birth, gender, employment history
- your health – this means the issue that you present with which requires our help, but also some background to your health and details of any current medication you are taking.

### 3.0 THE LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

There are six lawful bases for processing personal data, and we will only process your personal data for specific purposes in accordance with the following:

**3.1 Consent** – you consent to us using the sensitive personal data regarding your health and medical conditions and treatments which you have provided to enable us to offer you osteopathic treatment as a patient in our clinic.

**3.2 Vital interests** – we will only process your data in this regard if it is essential to do so in order to protect your or another person’s life.

**3.5 Public task** – we may use your anonymised personal data to monitor statistically the diversity profile of our patients. This will include information covered under the Protected Characteristics such as gender, age and disability.

#### **4.0 WHO WILL WE SHARE YOUR DATA WITH?**

While you are a current patient with us, we may need to share your personal data with internal staff and external third parties, including:

##### Internally

- Reception staff for booking appointments with you, and answering any queries you might have (limited access to data)
- Tutors who will be present during your consultation
- Students who will be present during your consultation
- Any potential observers (internal/external people) who will only observe once you have given your permission and they have signed a confidentiality agreement.

##### Externally

- External crime protection agencies
- Social services

#### **5.0 HOW LONG WILL YOUR DATA BE RETAINED?**

Subject to the exception below, your data will be retained by us for:

- Adults with no mental health issues 8 years after your last interaction with us
- Children up to 18 years old – until they are 18 and then a further 8 years

#### **6.0 PROTECTING YOUR DATA**

The ESO takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our students and employees, in the proper performance of their duties, and our external IT consultants, but only at our request and only to ensure specific IT support measures are enabled.

#### **7.0 YOUR RIGHTS**

Under the General Data Protection Regulations, you have the following rights:

- To be informed about the collection and use of your personal data
- To access and have copies of your personal data
- To require the ESO to amend your data if it is incorrect, or complete it if it is incomplete
- To have your personal data erased when, as an example, it is no longer required, or the processing no longer has a legal basis. Please note there are exceptions such as when the processing must continue by law or it is in the public interest
- To request that the ESO restricts the processing of your personal data. This will only apply in specific circumstances and for a set period.
- To data portability such that we will provide you with the personal data we hold about you so that you may transfer it to another data controller
- To object to the processing of your personal data unless we can evidence legitimate grounds to continue processing

Please note that we do not carry out any automated decision making (including profiling) of personal data.

If you would like to exercise any of these rights, please contact the Clinic Administration Manager.

If you believe that we have not complied with your data protection rights, you can complain to the Information Commissioner via <https://ico.org.uk/make-a-complaint/>

## **8.0 WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?**

You are under no statutory or contractual obligation to provide data to the ESO during your registration as a patient with us. However, if you do not provide the information, we will not be able to register you as a patient and consequently we will be unable to provide you with treatment.

## **9.0 KEEPING US UPDATED**

Please do keep us informed of any changes to the information we hold about you.

*If you have any questions about this Privacy Notice or how we process your personal data, please contact the Clinic Administration Manager.*