

PATIENT PRIVACY NOTICE

<p>What is GDPR?</p>	<p>GDPR stands for General Data Protection Regulation and it comes into effect on 25th May 2018.</p> <p>GDPR is a European-wide piece of legislation (and will still be a part of UK law after Brexit).</p> <p>GDPR is the new data protection regime which aims to give individuals more control over their personal data, and to hold the organisations who collect and store their personal data accountable.</p>
<p>Who is collecting your personal information?</p>	<p>As well as the new privacy regulations (GDPR) that came into effect on 25th May 2018, Phoenix Health is registered with the Information Commissioner’s Office (ICO) to process personal and special categories of information under the Data Protection Act 2018 (subject to Parliamentary approval). Our registration number is A1017583.</p> <p>We may collect some information about you when you first make an enquiry with Phoenix Health. We will get more information from you if you decide to become one of our patients so that we can register on our clinical system.</p> <p>When you talk with our clinical team (our consultants, nurses, dieticians and psychologists) they will also record some information about you.</p>
<p>What personal information is being collected?</p>	<p>When you make an enquiry with us and want some information about Phoenix Health, we may ask for some contact details from you – this might include your name, email, telephone</p>

	<p>number (or address). If you tell us you no longer want to hear from us, your personal data is deleted.</p> <p>Once you become a patient of ours by making an appointment, we will also collect your date of birth and GP details (if you are happy that we keep your GP informed about your treatment).</p> <p>When you have a consultation with one of our clinical team, they will also collect details about your health and medical history. They may need to contact other specialists to find out more about previous or existing conditions you have. We will ask your permission before we do this.</p>
<p>What is the lawful basis for processing your personal data?</p>	<p>GDPR requires us to process all personal data lawfully, fairly and in a transparent manner. We process your data under Article 6 Lawful Basis of “Contract”.</p> <p>When you first contact us, we agree with you specific steps that you want us to take – this may be sending you information about surgery packages, prices or details of our finance options for example. To do this, we will record some data about you to ensure we send you appropriate information.</p> <p>When you become a patient of Phoenix Health, you will receive copies of our consent form, which you will also go through with your surgeon on the day of your procedure. When you make payment for your procedure, you will also agree to our Terms and Conditions.</p> <p>Because we are looking after your health, we also have to meet a “special category data” condition for processing your data (Article 9 (2) of the GDPR): “processing is necessary.... for medical diagnosis...and the provision of health...treatment...”</p>

<p>Will we share your personal information with any third parties?</p>	<p>With your consent, we will share information about your health with your GP, and other clinicians if we feel it is necessary for your health.</p> <p>We do not share any identifiable information with any third parties without seeking your permission first.</p> <p>There may be an occasion when we are under a duty to share your information, due to a legal requirement. This includes, but is not limited to, disclosure under a court order, sharing with the Care Quality commission for inspection purposes, the police for the prevention or detection of crime or where there is an overriding public interest to prevent abuse or serious harm to others.</p> <p>We may share your anonymised* data for the purposes of audit and research. *When data is anonymised, it is impossible to identify an individual and is therefore no longer subject to GDPR.</p>
<p>How will we use your personal information?</p>	<p>We will use your information to keep in contact with you – it is therefore vital that you let us know if anything changes – for instance you move to a new house.</p> <p>We hold and process your information in accordance with the Data Protection Act 2018 (subject to Parliamentary approval) as amended by the GDPR and comply with the Common Law Duty of Confidentiality and various national and professional standards and requirements.</p>

	<p>With your agreement we will often communicate with you via email. We cannot guarantee the security of this information whilst in transit.</p> <p>The clinical staff involved in your care will use your information to advise and deliver the most appropriate care for you.</p> <p>Some anonymised/pseudonymised* information about you may be used in audit and research. *Pseudonymised means we have key-coded your personal data, and only Phoenix Health can identify you.</p>
<p>How long will we store your data?</p>	<p>If after making an enquiry with us you decide not to become a patient of Phoenix Health, we will delete any personal information we have about you.</p> <p>Once you become a patient of Phoenix Health, your clinical records will be retained in accordance with the law on “retention of records”. This is currently 8 years after the conclusion of treatment. After this period, your records will be deleted.</p> <p>We do not keep any records of any card or BACS payments. These are taken by a secure third party provider.</p>
<p>What rights do you have?</p>	<p>You can request the correction of inaccurate or incomplete information recorded in our health records, subject to certain safeguards.</p> <p>You can refuse/withdraw consent to the sharing of your health records. Under the Data Protection Act 2018 (subject to Parliamentary approval) we are authorised to process i.e.</p>

	<p>share, your health records for the “management of healthcare systems and service”. Your consent will only be required if we intend to share your health records beyond these purposes, for example research.</p> <p>You can request your personal information to be transferred to another provider in certain circumstances. We are still obliged to keep your records under the retention of records regulations.</p>
How can you make a complaint?	<p>We recognise that we don’t always get things right. If you have any concerns about how we have handled your personal data, you can contact our Data Protection Officer by:</p> <p>Email: enquirers@phoenix-health.co.uk</p> <p>Post: Phoenix Health PO Box 54 St Peters Square Ruthin LL15 9AQ</p>