

Oakdin (UK) Ltd

Privacy Notice

1. This policy

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

We may provide additional, specific privacy information to you as you interact with us in different ways (e.g. that we will only use certain information for specific purposes). To the extent that any of that information differs from what we say below, those specific statements will apply in those circumstances.

2. Who we are

Oakdin (UK) Ltd is the data controller in relation to the processing activities described below. This means that we decide why and how your personal information is processed. Our registered address is Room 44, Millfield Business Centre, Ashwells Road, Brentwood, Essex, CM15 9ST; our company number is 04509951; and the practice is regulated by the Care Quality Commission.

Our Director is responsible for our data protection function. You can find the relevant contact details at the end of this policy.

3. Your Personal Data and Clinicians

Personal data is defined in the GDPR as any information relating to an identified or identifiable natural person. It can include obvious data like your name but also identification numbers, online identifiers and/or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

As a patient of Oakdin, your treatment may be provided by a clinician who is a medical practitioner. Those clinicians make decisions about what information is collected about you, and may maintain their own set of medical records in relation to the treatment that they provide. They are a Data Controller in respect of your personal information which they hold within those records, meaning that they must comply with the data protection legislation and relevant guidance when handling your personal information. To the extent relevant to their practice, you can expect clinicians (including their medical secretaries) to handle your

information in line with this Privacy Notice. This includes using your personal information as set out in more detail below.

Clinicians who work with Oakdin (including their medical secretaries) are expected to handle your personal data in accordance with the principles set out within this Privacy Notice. This means that whenever they use your personal data, they will only do so as set out in this Privacy Notice.

4. Personal Data we collect

Categories of personal data that we may collect include:

Contact information:

This includes such information as your name, address, telephone numbers, email addresses, emergency contact details including next of kin, and other such information as may be necessary.

Identity Information and Documentation:

This includes:

- Documents to enable us to check and verify your identity, such as copies of passports, driving licences, bank statements, utility bills, records of home visits, and other such documentation as appropriate; and
- Other supporting information to enable us to check and verify your identity, in addition to your contact details, such as your, date of birth, gender, marital status, National Insurance number, your tax details, occupation and other such information as appropriate.

Billing and Financial Information:

This might include for example:

- your billing address, bank account and payment information
- Your bank and/or building society details
- Information to enable us to undertake a credit or other financial checks on you
- Your financial details so far as relevant

Marketing and Communications information:

This might include for example:

- Information about your use of our IT, communication and other systems, and other monitoring information, e.g. if using our secure online client portal;
- Details of your professional online presence, e.g. LinkedIn profile;
- Marketing, communication preferences and related information

5. Special Categories Personal Information

As a patient of Oakdin, we will hold information relating to your medical treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. The special categories of personal information we hold about you may include the following:

- Details of your current or former physical or mental health. This may include information about any healthcare you have received (both from Oakdin directly and other healthcare providers such as GPs, dentists or hospitals (private and/or NHS)) or need, including about clinic and hospital visits and medicines administered.
- Your medical records and notes, and details of your treatment and care
- Result of medical investigations you may have had
- Details of services you have received from us
- Details of your nationality, race and/or ethnicity
- Details of your religion
- Details of any genetic data or biometric data relating to you
- Data concerning your sex life and/or sexual orientation
- Background referral details

Depending on how we interact, some of the above personal data may be required to enable us to provide our service to you; so if you do not provide personal data that we ask for, it may delay or prevent us from providing services to you.

6. How your personal data is collected

We may collect personal information from a number of different sources including, but not limited to:

- GPs
- Dentists
- Other hospitals, both NHS and private
- Mental health providers
- Commissioners of healthcare services
- Clinicians (including their medical secretaries)

We may collect information **from you directly** when:

- You enter into a contract with us for the provision of healthcare services
- You use our website, products or services
- You complete enquiry forms and patient satisfaction forms
- You submit a query to us including through our website, by email or by social media
- you correspond with us by letter, email, telephone or social media, including where you reference us in a public social media post
- You take part in our marketing activities

We may also collect information **from other healthcare organisations**:

If you have received healthcare from another organisations, then in order to provide you with the best treatment possible we may have to collect personal information about you from those other organisations. These may include:

- Medical records from your GP
- Medical records from your clinician (including their medical secretaries)
- Medical records from your dentist
- Medical records from the NHS or any private healthcare organisation

Medical records include information about your diagnosis, clinic and hospital visits and medicines administered.

We may also collect information about you from **third parties** when:

- You are referred to us for the provision of services including healthcare services
- We liaise with your current or former employer, health professional or other treatment or benefit provider
- We liaise with your family
- We liaise with your insurance policy provider
- We deal with experts (including medical experts) and other service providers about services you have received or are receiving from us
- We deal with NHS health service bodies about services you have received or are receiving from us
- We liaise with credit reference agencies
- We liaise with debt collection agencies
- We liaise with Government agencies

In addition, we may receive information about you:

- via our information technology (IT) systems, e.g. monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems;
- from services such as Google Analytics, a web analytics service provided by Google, Inc. ("Google") whose servers are in the United States of America. If we engage Google Analytics, they will use cookies to help us analyse how users use our site.

7. How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, e.g.:

1. to comply with our legal and regulatory obligations;
2. for the performance of our contract with you or to take steps at your request before entering into a contract;
3. for our legitimate interests or those of a third party;
4. where you have given consent; or
5. Where it is necessary to protect your life.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal data for and our reasons for doing so - where we process your Special Category data (see section 5 above), we have provided the additional grounds upon which we rely (in italics):

What we use your personal data for	Why we use it
To provide our healthcare services to you	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>Providing you with healthcare and related services</p> <p><i>Additional grounds:</i></p> <p><i>We need to use the data in order to provide healthcare services to you</i></p> <p><i>The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent</i></p>
Conducting checks to identify our patients and verify their identity	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>To comply with our legal and regulatory obligations</p> <p><i>Additional ground:</i></p> <p><i>The use is necessary for reasons of substantial public interest.</i></p>
For account settlement purposes	<p>For the performance of our contract with you or to take steps at your request before entering into a contract</p> <p>Providing you with healthcare and related services</p> <p>For our legitimate interests</p> <p><i>Additional grounds:</i></p> <p><i>We need to use the data in order to provide healthcare services to you</i></p>

	<p><i>The use is necessary in order for us to establish, exercise or defend our legal rights</i></p>
<p>For medical audit/research purposes</p>	<p>We have a legitimate interest in helping with medical research and have put appropriate safeguards in place to protect your privacy</p> <p><i>Additional grounds:</i></p> <p><i>The processing is necessary in the public interest for statistical and scientific research purposes</i></p>
<p>Communicating with you and resolving any queries or complaints that you might have.</p>	<p>Our providing you with healthcare and other related services</p> <p>For our legitimate interests</p> <p><i>Additional grounds:</i></p> <p><i>The use is necessary for the provision of healthcare or treatment pursuant to a contract with a health professional</i></p> <p><i>The use is necessary in order for us to establish, exercise or defend our legal rights</i></p>
<p>Communicating with any other individual that you ask us to update about your care and updating other healthcare professionals about your care.</p>	<p>Our providing you with healthcare and other related services</p> <p>We have a legitimate interest in ensuring that other healthcare professionals who are routinely involved in your care have a full picture of your treatment</p> <p><i>Additional grounds:</i></p> <p><i>We need to use the data in order to provide healthcare services to you</i></p> <p><i>The use is necessary for reasons of substantial public interest under UK law</i></p> <p><i>The use is necessary in order for us to establish, exercise or defend our legal rights</i></p>

<p>Complying with our legal or regulatory obligations, and defending or exercising our legal rights</p>	<p>To comply with our legal and regulatory obligations</p> <p><i>Additional grounds:</i></p> <p><i>We need to use the data in order for others to provide informed healthcare services to you</i></p> <p><i>The use is necessary for reasons of the provision of health or social care or treatment or the management of health or social care systems</i></p> <p><i>The use is necessary for establishing, exercising or defending legal claims</i></p>
<p>Providing improved quality, training and security including conducting post treatment surveys</p>	<p>For our legitimate interests</p> <p><i>Additional ground:</i></p> <p><i>We need to use the data in order to manage the healthcare services we deliver, including carrying out surveys (which are not a form of marketing) in order to identify and carry out any necessary improvements</i></p>
<p>Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (eg tax or legal advice)</p>	<p>For our legitimate interests</p> <p>You have provided your consent</p>
<p><i>Provide marketing information to in accordance with your preferences</i></p>	<p>For our legitimate interests</p>

8. Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about legal developments that might be of interest to you and/or information about our services, including exclusive offers, promotions or new services or products.

We have a legitimate interest in processing your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and will never sell it to other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting us using the contact details at the end of this policy;
- using an of the stated opt-out methods detailed in promotional communications themselves.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

9. Who we share your personal data with

We may share your personal data with:

- A doctor, nurse, carer or any other healthcare professional involved in your treatment
- Other members of support staff involved in the delivery of your care, like receptionists and porters
- Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer
- NHS organisations, including NHS Resolution, NHS England, Department of Health
- Other private sector healthcare providers
- Your GP
- Your dentist
- Your clinician (including their medical secretaries)
- Third parties who assist in the administration of your healthcare, such as insurance companies
- Private Healthcare Information Network
- National and other professional research/audit programmes and registries
- Government bodies, including the Ministry of Defence, the Home Office and HMRC
- Our regulators, like the Care Quality Commission, Health Inspectorate Wales and Healthcare Improvement Scotland
- The police and other third parties where reasonably necessary for the prevention or detection of crime
- Our insurers
- Debt collection agencies
- Credit referencing agencies
- Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers
- Selected third parties in connection with any sale, transfer or disposal of our business

We may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

10. Where we store your personal information

Information may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see 'Who we share your personal data with').

On occasion, the information you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen where any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK. Where possible, we will seek to work with service providers whose servers are located within the EEA.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this policy for more information about the protections that we put in place.

11. How long we keep your personal information

We do not keep your personal data for any longer than is necessary to fulfil the purpose for which we collected it, or to comply with any legal, regulatory or reporting obligations or to assert or defend against legal claims.

Different retention periods apply for different types of data; when it is no longer necessary to retain your personal data, we will delete or anonymise it.

12. Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data, in certain situations

Restriction of processing	The right to require us to restrict processing of your personal data, in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party, in certain situations
To object	The right to object: <ul style="list-style-type: none"> • at any time to your personal data being processed for direct marketing (including profiling); • in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

You can exercise the above rights, where applicable by contacting us using the details at the end of this policy. We will require you to provide satisfactory proof of your identity in order to ensure that your rights are respected and protected, and to ensure that your personal data is disclosed only to you.

13. Withdrawing Consent

Where we rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy.

If you would like to withdraw your consent or object to receiving any direct marketing to which you previously opted-in, you can do so by using the contact details at the end of this policy. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

If you have provided consent for your details to be shared with a third party, and wish to withdraw this consent, please let us know - but please also contact the relevant third party in order to amend your preferences.

14. Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

15. Complaining to the UK data protection regulator

We'd like to be able to resolve all your concerns, and we hope that we can do so. Where we haven't been able to do this, you have the right to complain to the Information Commissioner's Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website for further details: <https://ico.org.uk>.

16. Changes to this Privacy Notice

This policy may change from time to time so please check www.oakdinclinic.com/privacy occasionally to ensure that you're happy with any changes. If you do not have online access, please just contact us using the details below, and we will be happy to send you a hard-copy of any updated policy. We will inform you in any case of any changes to this policy, if you are a patient of our Practice, and we are actively under our care.

17. Contact details

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you. Our contact details are shown below:

Director: Khalid Hameeduddin
Address: 58 Laindon Road, Billericay, Essex, CM12 9UJ
Email: khalid@oakdinclinic.org.uk
Tel: 01277 623055