

Waterside Chiropractic Privacy Policy

Waterside Chiropractic is committed to protecting and respecting your privacy and want everyone to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

To this end we comply fully with the data protection law in force in the UK (“Data Protection Laws”) and with all applicable clinical confidentiality guidelines including those published from time to time by the General Chiropractic Council and other statutory and/or regulatory bodies.

This Privacy Policy sets out the basis on which we collect and process personal data about you including our practices regarding the collection, use, storage and disclosure of personal data that we collect from you and/or hold about you or your animal(s), and your rights in relation to that data.

Please read the following carefully to understand how we process your personal data. By providing your personal data to us or by using our services, website or other online or digital platform(s) you are accepting or consenting to the practices as described or referred to in this Privacy Policy.

Who We Are and How to Contact Us

For the purpose of Data Protection Laws, (Data Protection Act 1998 and from 25th May 2018, the EU General Data Protection Regulation 2016/679 “Data Protection Law”) the data controller and processor is Jackie Leftwich, also known as or trading as Waterside Chiropractic, with registered address at: Waterside Farm, Wophams Lane, Birdham, Chichester, West Sussex PO20 7BS, United Kingdom.

For further information about our privacy practices, you can contact us at the above address in writing, by email to info@watersidechiropractic.co.uk, or by calling on 07738 110570.

When we refer to ‘we’, ‘us’ and ‘our’, we mean Waterside Chiropractic.

What Personal Data Might We Collect From You

When we refer to personal data in this policy, we mean information that can or has the potential to identify you as an individual.

Accordingly, we may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit our website, complete a form, access our services or speak to us. Depending on what services you receive from us this may include sensitive personal data such as information relating to your health.

Personal data we collect from you may include the following:

- information that you give us when you enquire or become a customer or patient of us including name, address, date of birth, contact details (including email address and telephone numbers);
- details of you/your animal(s) medical/veterinary history, both physical and mental;
- details of referrals and other contact and correspondence we may have had with you;
- details of services and/or treatment you have received from us or which have been received from a third party, and/or referred on to us;
- recordings of calls we receive or make;
- notes and reports about your health and any treatment and care you have received and/or need, including about clinic and hospital visits and medicines taken;
- patient feedback and treatment outcome information you provide;
- information about complaints and incidents;
- information you give us when you make a payment to us, such as financial or credit card information;
- other information received from other sources, including from your use of websites and other digital platforms we operate or the other services we provide, information from business partners, advertising networks, analytics providers, or information provided by other companies who have obtained your permission to share information about you.

Where you use our website or other social media feeds, we may automatically collect personal data about you including:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.

We will only use this information:

- for the purposes of dealing with your enquiry, training purposes and quality monitoring or evaluating the services we provide;
- we will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to themselves, others or children contacting us and sharing serious issues such as physical abuse or exploitation;
- where you have given us your express consent or otherwise clearly indicated this to us.

By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

Sensitive Personal Data

The data that we request from you may include sensitive personal data. If you provide us with any Sensitive Personal Data by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Data can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

This includes information that relates to the physical, mental or emotional health of the person or animal (which may include children's data).

Children's Personal Data

Our website is a general audience website and is not intended or designed for children. We do not knowingly collect personal information, personally identifiable data or sensitive personal data from children. We are committed to protect the privacy of children by making every reasonable effort to ensure that a parent/guardian has authorised the collection of the child's personal data. If you are under the age of 18 years and would like to ask a question or use the website in any way which requires you to provide your personal information, this should be made by a parent or guardian on your behalf.

How We Collect Personal Data About You/Your Animal

We may collect personal data about you/your animal if you:

- register to be a customer/client or patient with us or book to receive any of our services or treatments;
- visit our website or social media feeds;
- enquire about any of our services or treatments;
- carry out a financial transaction;
- fill in a form or survey for us;
- contact us, for example by email, telephone or social media;
- participate in interactive features on our website or social media feeds.

What Personal Data We May Receive from Third Parties and Other Sources

We may collect personal data about you from third parties such as:

- if you are a patient or client of a third party (e.g. other health professional, veterinary surgeon, other referral agent or agency) who has taken up one of our services, we may be

passed your name, address, contact number, email address and referral information in order to get in touch with you to arrange an appointment or collect further information from you;

- independent third parties acting on our behalf who may collect personal data from you to allow us to carry out the services we offer, e.g. a health professional or veterinary surgeon may carry out your initial or a subsequent consultation and collect personal data from you which is subsequently shared with Waterside Chiropractic for the continuity of your/your animal(s) care and may be used for quality and monitoring purposes;
- we may carry out work on behalf of other health or veterinary professionals and for the continuity of your care we may be passed medical/veterinary information usually in the form of a referral for the purposes of your treatment with Waterside Chiropractic;
- insurance providers may pass Waterside Chiropractic personal data of patients and animal clients who have commenced a claim and require medical/veterinary treatment with Waterside Chiropractic. This will normally be in the form of a referral and may consist of basic details, e.g. full name, date of birth, address, contact number and email address and the type of procedure/treatment they access.

How We Use Your Personal Data

Your personal data will be kept confidential and secure and will, unless you agree otherwise, only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws, clinical records retention periods and clinical confidentiality guidelines.

Sensitive personal data related to your or your animal(s) health will only be disclosed to those involved with your/your animal(s) treatment or care, or in accordance with UK laws and guidelines of professional bodies or for the purpose of clinical audits (unless you object). Further details on how we use health related personal data are given below. We will only use your sensitive personal data for the purposes for which you have given us your explicit consent to use it. Please note that, although we have set out the purposes for which we may use your personal data below, we will not use your sensitive personal data for those purposes unless you have given us your explicit consent to do so.

We may use your personal data to:

- enable internal record keeping processes;
- enable us to carry out our obligations to you arising from any contract entered into between you and us including relating to the provision by us of services or treatments to you and related matter such as, billing, accounting and audit, credit or other payment card verification and anti-fraud screening;
- provide you with information, products or services that you request from us;
- allow you to participate in any interactive features of our services, when you choose to do so;
- notify you about changes to our products or services;
- respond to requests where we have a legal or regulatory obligation to do so;

- check the accuracy of information about you and the quality of your treatment or care, including auditing medical/veterinary and billing information for insurance claims as well as part of any claims or litigation process;
- support your doctor, nurse, veterinary surgeon or other relevant healthcare professional;
- assess the quality and/or type of care you have received (including giving you the opportunity to complete customer satisfaction surveys) and any concerns or complaints you may raise, so that these can be properly investigated;
- to conduct and analyse market research;
- to ensure that content from any of our websites is presented in the most effective manner for you and for your computer.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

The Security of Your Personal Data

We are committed to ensuring that your information is secure. We protect all personal data we hold about you by ensuring that we have appropriate organisational and technical security measures in place to prevent unauthorised access or unlawful processing of personal data and to prevent personal data being lost, destroyed or damaged. We conduct assessments to ensure the ongoing security of our information systems.

Any personal data you provide will be held for as long as is necessary having regard to the purpose for which it was collected and in accordance with all applicable UK laws (see below – Management of Records).

All information you provide to us is stored securely. Any payment transactions will be processed securely by third party payment processors. Waterside Chiropractic is fully PCI compliant via the Payment Card Industry Data Security Standard (PCI DSS) requirements, the council set up by the major credit card providers in a joint effort to reduce credit and debit card fraud. An annual reassessment and certification ensures on-going compliance.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our website, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

The transmission of information via the internet cannot be guaranteed as completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our website may contain links to other websites of interest. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information

which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

However, we ensure that any information transferred to our website is via an encrypted connection. Once we have received your information, we will use strict procedures and security features for prevention of unauthorised access.

We will not sell, distribute or lease your personal information to third parties unless we expressly have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting but only if you tell us that you wish this to happen.

At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission; if you choose to send or receive such information via email, you do so at your own risk.

Management of Patient Records

Legally we must maintain patient records and store them safely and in good condition for eight years from the date of the patient's last visit, or, if the patient is a child, until his or her 25th birthday, or 26th birthday if the patient was 17 at the conclusion of treatment.

Patient records include such information as:

- the patient's personal data;
- the case history of the patient;
- the patient's consent to assessment and care;
- the assessment and reassessment of the patient's health and health needs (including the outcomes of further investigations);
- the diagnosis or rationale for care (or both);
- the initial and reviewed plans of care for the patient;
- the care provided to the patient (including any advice given face to face or over the phone);
- any referrals;
- clinical images; and
- copies of correspondence.

The requirement of eight years is in line with the requirements that cover general NHS hospital records and other forms of health records. The purpose of this requirement is to make sure that the patient can have access to their recent health records and to provide protection if any complaints are made.

Disclosure of Your Personal Data

Sensitive personal data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Policy. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies. Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment expenses or their agents. It may also be provided to external service providers and regulatory bodies (unless you object) for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

Medical/veterinary professionals working with us: We share clinical information about you/your animal(s) with our medical/veterinary professionals as we think necessary for your/your animal(s) treatment. Medical/veterinary professionals working with us might be independent consultants in private practice. In the case of independent consultants, the consultant is the data controller of your personal data, either alone or jointly with us and will be required to maintain their own records in accordance with Data Protection Laws and applicable clinical confidential guidelines and retention periods. Where that is the case, we may refer you to that consultant to exercise your rights over your data. In all circumstances, those individual consultants will only process your personal data for the purposes set out in this Privacy Policy or as otherwise notified to you.

External practitioners: If we refer you externally for treatment, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Your GP: If when treating you we believe it to be clinically advisable, we may also share information about your treatment with your GP. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.

Your veterinary surgeon: If when treating your animal(s) we believe it to be clinically advisable, we may also share information about your animal(s) treatment with your veterinary surgeon. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your animal(s) health to deny your veterinary surgeon full information about your animal(s) care and history, and we strongly advise against it.

Your insurer: We share with your medical/veterinary insurer information about your/your animal(s) treatment, its clinical necessity and its cost, only if they are paying for all or part of your treatment with us. We provide only the information to which they are entitled. If you raise a complaint or a claim we may be required to share personal data with your medical/veterinary insurer for the purposes of investigating any complaint/claim.

The NHS: If you are referred to us for treatment by the NHS, we will share the details of your treatment with the part of the NHS that referred you to us, as necessary to perform, process and report back on that treatment.

Medical regulators: We may be requested – and in some cases can be required - to share certain information (including personal data and sensitive personal data) about you and your care with medical regulators such as the General Chiropractic Council, for example if you make a complaint, or the conduct of a chiropractic professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.

From time to time we may also make information available on the basis of necessity for the provision of healthcare, but subject always to patient confidentiality.

In an emergency and if you are incapacitated, we may also process your personal data (including sensitive personal data) or make personal data available to third parties on the basis of protecting your 'vital interest' (i.e. your/your animal(s) life or health).

We will use your personal data in order to monitor the outcome of your treatment by us and any treatment associated with your care, including any NHS treatment.

We may participate in national audits and initiatives to help ensure that patients are getting the best possible outcomes from their treatment and care. The highest standards of confidentiality will be applied to your personal data in accordance with Data Protection Laws and confidentiality. Any publishing of this data will be in anonymised, statistical form. Anonymous or aggregated data may be used by us, or disclosed to others, for research or statistical purposes.

Waterside Chiropractic and Cookies

Certain non-personal information collected when accessing the website which you submit may also be collected to enable us to better understand our patients and customers, to improve our website, to inform and help provide a better experience of our services. We may use cookies to do this.

We may also use other companies to set cookies on our websites and gather cookie information for us – please refer to the information detailed below. From time to time we may also analyse Internet Protocol (IP) addresses or other anonymous data sources.

'Cookie' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, cannot be used to identify you.

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

We use cookies as per the categorisation set out by the International Chamber of Commerce in their [UK Cookie Guide](#).

There are four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our contact form. Without these cookies, services you have asked for cannot be provided. Your consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by you. We use these types of cookies.

- Performance cookies collect anonymous information about how you use our website. These cookies collect information, for instance which pages visitors go to most often and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All the information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works. Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioural/targeted advertising networks.

We use these types of cookies. By using our website and online services you agree that we can place these types of cookies on your device.

- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. These cookies allow our websites to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. The information these cookies collect is generally anonymised and they cannot track your browsing activity on other websites.

We use these types of cookies. By using our website and online services you agree that we can place these types of cookies on your device.

- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

We **do not** use these cookies on our website.

(Definitions used above are consistent with those supplied by the International Chamber of Commerce 'ICC UK Cookie Guide' April 2012.)

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control.

You can [find out how to control and delete cookies](#) in your browser.

But, if you choose to refuse cookies, our website may not function for you as we would like it to.

If you have any questions about how we use cookies, please contact us.

Your Rights

You have various rights in respect of the personal data we hold about you/your animal(s) – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting Waterside Chiropractic by post to Waterside Farm, Wophams Lane, Birdham, Chichester, West Sussex PO20 7BS, or by email at info@watersidechiropractic.co.uk and/or by telephone on 07738 110570. If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website <https://ico.org.uk>

- **Access to your personal information:** you have the right to request access to a copy of the personal information that we hold about you or your animal(s), along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. With some exceptions designed to protect the rights of others, and subject to payment of a small administrative fee (currently £10, or up to £50 for paper-based health records), you have the right to a copy of the personal data that we hold about you. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** you can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. Please contact us as noted above, providing details of your objection.
- **Consent:** if you have given us your consent to use personal information, you can withdraw your consent at any time.
- **Rectification:** you can ask us to change or complete any inaccurate or incomplete personal information held about you. It is important to understand that this right does not extend to matters of opinion, such as medical diagnoses. If any of your personal data has changed, especially contact information such as, name, email address, postal address, telephone number(s), please get in touch with us using the contact information stated above so we can ensure your personal data is kept up to date.

- **Erasure:** you can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** you can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.
- **Restriction:** you can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

Changes to our Privacy Policy

We keep our Privacy Policy under regular review and as a result it may be amended from time to time without notice by updating this page. As a result we encourage you to review this Privacy Policy regularly to ensure that you are happy with any changes. This policy is effective from 15th May 2018.

Contact

If you have any questions in relation to our privacy policy, please email us at info@watersidechiropractic.co.uk or write to Waterside Chiropractic at:

Waterside Farm
Wophams Lane
Birdham
Chichester
West Sussex
PO20 7BS
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