Data & Privacy Policy

As your treating clinician and therefore custodian of personal information relating to your medical treatment, I must only use that information in accordance with all applicable law and guidance. This Privacy Notice provides you with a detailed overview of how I will manage your data from the point at which it is gathered and onwards, and how that complies with the law. I will use your personal information for a variety of purposes including, but not limited to, providing you with care and treatment, sharing it with other medical professionals and research/clinical audit programmes.

In addition, you have several rights as a data subject. You can, for instance, seek access to your medical information, object to me using your information in particular ways, request rectification of any information which is inaccurate or deletion of information which is no longer required (subject to certain exceptions). This Privacy Notice also sets out your rights in respect of your personal information, and how to exercise them.

Introduction

This Privacy Notice sets out details of the information that I, as a clinician responsible for your treatment (and including my medical secretaries), may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully.

About me

In this Privacy Notice I use "I" or "mine" or "my" to refer to me as the clinician who is using your personal information.

In the event that you have any queries, comments or concerns in respect of the manner in which I have used, or potentially will use, your personal information then you should contact me directly and I would be happy to discuss further. Please contact our office on 01844 208432, email luisa@worldvisionltd.co.uk or write to us at: Hillsdale, Chearsley Road, Long Crendon HP18 9XH

Your personal data

I am a Data Controller in respect of your personal information which I hold about you. This will mainly relate to your medical treatment, but will be likely to also include other information such as financial data in relation to billing. I must comply with the data protection legislation and relevant guidance when handling your personal information, and so must any medical secretary who assists me in an administrative capacity. Your personal data may include any images taken in relation to your treatment which must not only be managed in accordance with the law, this Privacy Notice but also all applicable professional standards including guidance from the General Medical Council and British Medical Association.

Page | 1 V1 9/9/21 I will provide your treatment from private hospitals including Spire Thames Valley Hospital, Spire Harpenden Hospital and Spire Dunedin Hospital.; and, in due course, it may be necessary for these hospitals to also process your personal data. I will do so in accordance with the law, the principles of this Privacy Notice and to the extent that it is necessary to do so. This could be where the hospitals need to arrange other healthcare services as part of your treatment, such as nursing or dietician advice, or support other aspects of the treatment which I provide to you. In that case, the hospitals will become a joint Data Controller in respect of your personal information and you will be provided with a copy of their Privacy Notice which sets out how they will manage that information.

Your personal information will be handled in accordance with the principles set out within this Privacy Notice. This means that whenever I use your personal data, I will only do so as set out in this Privacy Notice. From time to time, I may process your personal information at other sites, as may my medical secretary.

What personal information do I collect and use from patients?

I will use special categories of personal information (previously known as "sensitive personal data") about you, such as information relating to your physical and mental health.

If you provide personal information to me about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. I will also process such information in accordance with this Privacy Notice.

In addition, you should note that in the event you amend data which I already hold about you (for instance by amending a pre-populated form) then I will update our systems to reflect the amendments. Our systems will continue to store historical data.

Personal information

As one of my patients, the personal information I hold about you may include the following:

- Name
- Contact details, such as postal address, email address and telephone number (including mobile number)
- Occupation
- Emergency contact details, including next of kin
- Background referral details

Special Categories Personal Information

As one of my patients, I 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. This may include the following:

- a. Details of your current or former physical or mental health, including information about any healthcare you have received from other healthcare providers such as GPs, dentists or hospitals (private and/or NHS), which may include details of clinic and hospital visits, as well as medicines administered. I will provide further details below on the manner in which I handle such information.
- b. Details of services you have received from me
- c. Details of your nationality, race and/or ethnicity
- d. Details of your religion
- e. Details of any genetic data or biometric data relating to you
- f. Data concerning your sex life and/or sexual orientation

The confidentiality of your medical information is important to me, and I make every effort to prevent unauthorised access to and use of information relating to your current or former physical and mental health (or indeed any of your personal information more generally). In doing so, I will comply with UK data protection law, including the Data Protection Act 2018 and all applicable medical confidentiality guidelines issued by professional bodies including, but not limited to, the General Medical Council and the Nursing and Midwifery Council.

From 25 May 2018, the current Data Protection Act will be replaced by the EU General Data Protection Regulation (GDPR) and a new Data Protection Act. All uses of your information will comply with the GDPR and the new Data Protection Act from that date onwards

How do I collect your information?

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

- a. GPs
- b. Dentists
- c. Other hospitals, both NHS and private (including Spire/other independent provider)
- d. Opticians
- e. Other clinicians (including their medical secretaries)

Directly from you

Information may be collected directly from you when:

- a. You enter into a contract with me or other clinicians or hospitals for the provision of healthcare services
- b. You use those services
- c. You complete enquiry forms on the [Spire/other independent provider] website
- d. You submit a query to me including by email or by social media
- e. You correspond with me by letter, email, telephone, or social media.
- f. You use other hospital doctors

From other healthcare organisations

My patients will usually receive healthcare from other organisations, and so in order to provide you with the best treatment possible I may have to collect personal information about you from them. These may include:

- a. Medical records from your GP
- b. Medical records from other clinicians (including their medical secretaries)
- c. Medical records from your dentist
- d. Medical records from the NHS or any private healthcare organisation
- e. Medical records from your optician

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

As detailed in the previous section, it is often necessary to seek information from other healthcare organisations. I may also collect information about you from third parties when:

- a. You are referred to me for the provision of services including healthcare services
- b. I liaise with your current or former employer, health professional or other treatment or benefit provider
- c. I liaise with your family
- d. I liaise with your insurance policy provider
- e. I deal with experts (including medical experts) and other service providers about services you have received or are receiving from me
- f. I deal with NHS health service bodies about services you have received or are receiving from us

How will I communicate with you?

I may communicate with you in a range of ways, including by telephone, SMS, email, and / or post. If I contact you using the telephone number(s) which you have provided (landline and/or mobile), and you are not available which results in the call being directed to a voicemail and/or answering service, I may leave a voice message on your voicemail and/or answering service as appropriate, and including only sufficient basic details to enable you to identify who the call is from, very limited detail as to the reason for the call and how to call me back.

<u>However</u>

a. To ensure that I provide you with timely updates and reminders in relation to your healthcare (including basic administration information and appointment information (including reminders)), I may communicate with you by SMS and/or unencrypted email (where you have provided me with your SMS or email address) [in each case where you have expressed a preference in the patient registration form to be contacted by SMS and / or email.]

To provide you with your medical information (including test results and other clinical updates) and/or invoicing information, I may communicate with you by email where you have provided me with your email address and have expressed a preference in the patient registration form to be contacted by email. The first time I send you any important encrypted email that I am not also sending by post or which requires action to be taken, I will endeavour to contact you separately to ensure that you are able to access the encrypted email you are sent.

Please note that although providing your mobile number and email address and stating a preference to be communicated by a particular method will be taken as an affirmative confirmation that you are happy for us to contact you in that manner, I am not relying on your consent to process your personal data in order to correspond with you about your treatment. As set out further below, processing your personal data for those purposes is justified on the basis that it is necessary to provide you with healthcare service.

What are the purposes for which your information is used?

I may 'process' your information for a number of different purposes, which is essentially the language used by the law to mean using your data. Each time I use your data I must have a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data. When the information that we process is classed as a special category of personal information, I must have a specific additional legal justification in order to use it as proposed.

The right to object to other uses of your personal data

You have a range of rights in respect of your personal data, as set out in detail in sections [TBC]. This includes the right to object to me using your personal information in a particular way (such as sharing that information with third parties), and I must stop using it in that way unless specific exceptions apply. This includes, for example, if it is necessary to defend a legal claim brought against me, or it is otherwise necessary for the purposes of your ongoing treatment.

You will find details of my legal grounds for each of our processing purposes below. I have set out individually those purposes for which I will use your personal information, and under each one I set out the legal justifications, or grounds, which allow me to do so. You will note that I have set out a legal ground, as well as an 'additional' legal ground for special categories of personal information. This is because I have to demonstrate additional legal grounds where using information which relates to a person's healthcare, as I will be the majority of the times I use your personal information.

Purpose 1: To set you up as my patient, including carrying out fraud, credit, anti-money laundering and other regulatory checks

As is common with most business, I have to carry out necessary checks in order for you to become a patient. These include standard background checks, which I cannot perform without using your personal information.

Legal ground: Taking the necessary steps so that you can enter into a contract with me for the delivery of healthcare.

Additional legal ground for special categories of personal information: The use is necessary for reasons of substantial public interest, and it is also in my legitimate interests to do so.

Purpose 2: To provide you with healthcare and related servicesClearly, the reason you come to me is to provide you with healthcare, and so I have to use your personal information for that purpose.

Legal grounds

- a. Providing you with healthcare and related services
- b. Fulfilling my contract with you for the delivery of healthcare

Additional legal grounds for special categories of personal information

- a. I need to use the data in order to provide healthcare services to you.
- b. The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent.

Purpose 3: For account settlement purposes

I will use your personal information in order to ensure that your account and billing is fully accurate and up-to-date

Legal grounds

- a. My providing you healthcare and other related services
- b. Fulfilling my contract with you for the delivery of healthcare
- c. My having an appropriate business need to use your information which does not overly prejudice you
- d. Your consent

Additional legal grounds for special categories of personal information

36.a I need to use the data in order to provide healthcare services to you

36.b The use is necessary in order for me to establish, exercise or defend my legal rights

36.c Your consent

Purpose 4: For medical audit/research purposes

Clinical audit

I may process your personal data for the purposes of local clinical audit i.e. an audit carried out by myself or my direct team for the purposes of assessing

outcomes for patients and identifying improvements which could be made for the future. I am able to do so on the basis of my legitimate interest and the public interest in statistical and scientific research, and with appropriate safeguards in place. You are, however, entitled to object to my using your personal data for this purpose, and as a result of which I would need to stop doing so. If you would like to raise such an objection then please contact me using the details provided in paragraph 3 above.

I may also be asked to share information with U.K. registries for which ethical approval is not necessarily required but which form part of the National Clinical Audit programme, hosted by NHS England and who provide a list of National Clinical Audit and Clinical Outcome Review programmes and other quality improvement programmes which we should prioritise for participation. I may do so without your consent provided that the particular audit registry has received statutory approval, or where the information will be provided in a purely anonymous form, otherwise your consent will be needed and either I will seek this from you or the registry themselves will do so.

Disclosures to third parties

I may disclose your information to the third parties listed below for the purposes described in this Privacy Notice. This might include:

- a. A doctor, nurse, carer, optician or any other healthcare professional involved in your treatment
- b. Other members of support staff involved in the delivery of your care, like receptionists and porters
- c. Anyone that you ask me to communicate with or provide as an emergency contact, for example your next of kin or carer
- d. NHS organisations, including NHS Resolution, NHS England, Department of Health
- e. Other private sector healthcare providers
- f. Your GP
- g. Your dentist
- h. Other clinicians (including their medical secretaries)
- i. Third parties who assist in the administration of your healthcare, such as insurance companies
- j. Private Healthcare Information Network
- k. National and other professional research/audit programmes and registries, as detailed under purpose 4 above
- I. Government bodies, including the Ministry of Defence, the Home Office and HMRC
- m. Our regulators, like the Care Quality Commission, Health Inspectorate Wales and Healthcare Improvement Scotland
- n. The police and other third parties where reasonably necessary for the prevention or detection of crime
- o. Our insurers
- p. Debt collection agencies
- q. Credit referencing agencies
- r. Our third party services providers such as IT suppliers, actuaries, auditors, lawyers, marketing agencies, document management providers and tax advisers

Page | 7 V1 9/9/21

- s. Selected third parties in connection with any sale, transfer or disposal of our business
- t. I may also use your personal information to provide you with information about products or services which may be of interest to you where you have provided your consent for me to do so.

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

How long do I keep personal information for?

I will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice and in order to comply with my legal and regulatory obligations.

If you would like further information regarding the periods for which your personal information will be stored, please contact me using the details outlined in section 3.

International data transfers

I (or third parties acting on my behalf) may store or process information that we collect about you in countries outside the European Economic Area ("EEA"). Where I make a transfer of your personal information outside of the EEA I will take the required steps to ensure that your personal information is protected.

a. To the extent that it is necessary to do so, I may transfer your personal data outside of the EEA to:

I will only do so to the extent that it is relevant and necessary. Under certain circumstances, I may request your consent for such a transfer.

If you would like further information regarding the steps I take to safeguard your personal information, please contact me using the details provided in section 3 above.

Your rights

Under data protection law you have certain rights in relation to the personal information that I hold about you. These include rights to know what information I hold about you and how it is used. You may exercise these rights at any time by contacting me using the details provided at section 3 above.

There will not usually be a charge for handling a request to exercise your rights.

If I cannot comply with your request to exercise your rights we will usually tell you why.

There are some special rules about how these rights apply to health information as set out in legislation including the Data Protection Act (current and future),

the General Data Protection Regulation as well as any secondary legislation which regulates the use of personal information.

74. If you make a large number of requests or it is clear that it is not reasonable for me to comply with a request then we do not have to respond. Alternatively, I can charge for responding.

Your rights include:

The right to access your personal information

You are usually entitled to a copy of the personal information I hold about you and details about how I use it.

Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (e.g. by email) the information will be provided to you by electronic means where possible.

Please note that in some cases I may not be able to fully comply with your request, for example if your request involves the personal data of another person and it would not be fair to that person to provide it to you.

You are entitled to the following under data protection law.

- 1. Under Article 15(1) of the GDPR I must usually confirm whether I have personal information about you. If I do hold personal information about you I usually need to explain to you:
- i. The purposes for which I use your personal information
- ii. The types of personal information I hold about you
- iii. Who your personal information has been or will be shared with, including in particular organisations based outside the EEA.
- iv. If your personal information leaves the EU, how I will make sure that it is protected
- v. Where possible, the length of time I expect to hold your personal information. If that is not possible, the criteria I use to determine how long I hold your information for
- vi. If the personal data I hold about you was not provided by you, details of the source of the information
- vii. Whether I make any decisions about you solely by computer and if so details of how those decision are made and the impact they may have on you viii. Your right to ask me to amend or delete your personal information
- ix. Your right to ask me to restrict how your personal information is used or to object to my use of your personal information
- x. Your right to complain to the Information Commissioner's Office
- 2. I also need to provide you with a copy of your personal data, provided specific exceptions and exemptions do not apply.

The right to rectification

I take reasonable steps to ensure that the information I hold about you is accurate and complete. However, if you do not believe this is the case, you can ask me to update or amend it.

The right to erasure (also known as the right to be forgotten)

I may update this Privacy Notice from time to time to ensure that it remains accurate, and the most up-to-date version can always be found at this website. In the event that there are any material changes to the manner in which your personal information is to be used then I will provide you with an updated copy of this Privacy Notice.

In some circumstances, you have the right to request that I delete the personal information I hold about you. However, there are exceptions to this right and in certain circumstances I can refuse to delete the information in question. In particular, for example, I do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercising or defending legal claims.

The right to restriction of processing

In some circumstances, I must "pause" our use of your personal data if you ask me to do so, although I do not have to comply with all requests to restrict my use of your personal information. In particular, for example, I do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to data portability

In some circumstances, I must transfer personal information that you have provided to you or (if this is technically feasible) another individual/ organisation of your choice. The information must be transferred in an electronic format.

The right not to be subject to automatic decisions (i.e. decisions that are made about you by computer alone)

You have a right to not be subject to automatic decisions (i.e. decisions that are made about you by computer alone) that have a legal or other significant effect on you.

86. Please see section 80 for detail about when we may make automatic decisions about you.

If you have been subject to an automated decision and do not agree with the outcome, you can challenge the decision.

The right to withdraw consent

In some cases I may need your consent in order for my use of your personal information to comply with data protection legislation. Where we do this, you

have the right to withdraw your consent to further use of your personal information. You can do this by contacting me using the details provided at section 3 above.

The right to complain to the Information Commissioner's Office

You can complain to the Information Commissioner's Office if you are unhappy with the way that I have dealt with a request from you to exercise any of these rights, or if you think I have not complied with our legal obligations.

More information can be found on the Information Commissions Office website: https://ico.org.uk/

Making a complaint will not affect any other legal rights or remedies that you have.

Updates to this Privacy Notice

I may update this Privacy Notice from time to time to ensure that it remains accurate. In the event that these changes result in any material difference to the manner in which I process your personal data then I will provide you with an updated copy of the Policy.

This Privacy Notice was last updated on 09.09.2021

Financial Declarations

Price list

New patient consultation £204.00 max Follow up appointment £180.00 max

Tests

Any diagnostic tests required, will be charged a clinic fee as extra.

Please remember that insurance is considered a method of reimbursing the patient for fees paid to the doctor and is not a substitute for payment. Some companies pay fixed allowances for certain procedures, and others pay a percentage of the charge. It is patients responsibility to pay any deductible amount, co-insurance, or any other balance not paid for by your insurance.

Cancellations/non- attendance

Please note that we reserve the option to charge a fee of £50 for nonattendance or cancellation of each scheduled appointment if 24 hours notice is not given.

Privacy Policy

World Vision Ltd is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement. World Vision Ltd may change this policy from time to time by updating this page.

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

Reasons/purposes for processing information

We process personal information to enable us to provide health services to our patients, to maintain our accounts and records, promote our services and to support and manage our employees.

Type/classes of information processed

We process information relevant to the above reasons/purposes. This information may include:

- personal details
- family details
- lifestyle and social circumstances
- goods and services
- financial details
- employment and education details

Who the information is processed about

We process personal information about our:

- patients
- customers and clients
- staff
- suppliers
- business contacts
- professional advisers

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share

some of the personal information we process with for one or more reasons.

Where necessary or required we share information with healthcare professionals, social and welfare organization, central government, business associates family, associates and representatives of the person whose personal data we are processing suppliers and service providers; financial organisations current, past and prospective employers; employment agencies and examining bodies.

Transfers

It may sometimes be necessary to transfer personal information overseas. Any transfers made will be in full compliance with all aspects of the data protection act.

How To Complain:

You can complain to the IOC if you are unhappy with how we have used your data.

The IOC's address:

Information Commissioner's Office Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Helpline number: 03031231123