

PRIVACY POLICY AND NOTICE

Pure Dentistry Ltd

Thank you for visiting our website, we request that you read our Privacy Policy in its entirety. This Notice explains how we obtain, use and disclose your personal information, in accordance with the requirements of the Protection of Personal Information Act no. 4 of 2013 ("POPI Act"). At Pure Dentistry Ltd we are committed to protecting your privacy and ensuring your personal information is collected and used lawfully and transparently.

This Privacy Policy, in conjunction with our Terms and Conditions and Cookie Policy provides the basis for which personal information collected from you, or provided to us from you will be processed by us. In adopting this Privacy Policy, we aim to ensure your Personal Information is processed lawfully.

Please also see:

[Pure Dentistry Privacy notice](#)

By continuing to use this website, you consent to the processing of your Personal Information to the extent provided for in this Privacy Policy, and you agree to the Terms and Conditions and Cookie Policy.

Definition of personal information

According to the POPI Act, Personal information is defined as, "information relating to an identifiable, living, natural person, and where it is applicable, an identifiable, existing juristic person..."

As relevant to the information we collect, this definition explicitly includes as personal information, the following:

- Any identifying number;
- Symbol;
- e-mail address;
- physical address;
- telephone number;
- location information;
- online identifier; or
- other particular assignment to the person.

Our legal basis for the collection of your information

In accordance with the POPI Act, our legal basis for the collection and processing of your personal information is consent. Consent is explicitly provided by you in agreeing with the terms provided herein by continuing to use this website.

What type of information does Pure Dentistry Ltd collect from you and for what purposes?

We collect and process your personal information mainly to

- Serve relevant adverts

- Process payments
- Fulfil deliveries
- Create customer accounts
- Develop personalised profiles
- Contact you when necessary

For this specified purpose, we collect the following information as is necessary to provide our content and services:

This may include information that can directly or indirectly may identify you.

Specifically, personal information may include;

- First and last name;
- Screen name;
- Profile pictures.
- Email address & other contact information;
- Postal address & other information;
- Date of birth;
- IP address.

We may also collect additional information, such as;

- Your interests, preferences, online behaviour, geographical location, demographics information.

On occasion we may combine Personal Information with additional information to develop a customer profile as required by our business operations.

We aim to limit the collection of personal information only to that in which you consent to (personal information collected through email correspondence, online registration, agreement with terms and conditions and this policy, surveys, polls, mobile services).

When visiting our website, our web-server automatically collects specific information (this information cannot directly identify you):

- The name of your ISP;
- Prior website visited;
- The pages on our site and what sequence;
- Length of time visited.

We, and specific third-parties and partners may utilise cookies or similar tracking technologies to send information to your computer, in order to enhance your online experience by providing you with specialised, specific content based on your own preferences, and allow us to analyse traffic on the website.

Web beacons used? To track use of sites, whether emails have been opened, etc.

Passive information collection – personal information collected from mobile device? May include:

- Contact details;
- Device;
- Device event information;
- Site activity information;
- Log information;
- Telephony log information;

- Location information;
- Other information your device may permit us to collect.

Privacy Notice for Children

The practice keeps records of your name, address, date of birth and details of any health problems as well as details of your dental treatment and details about your family. We keep this information so that we can provide you with the best dental care. Your personal information is kept very confidentially and securely.

We only use your personal information so we can give you the best dental care and for sending reminders to you.

We only pass your personal information to another dentist, doctor, or hospital if you have a problem that requires their special skills, and you need to go and see them. We will not give your information to anyone else unless the law allows us to, or we have to provide it for legal reasons. If you leave the practice, we will stop using your information, but will keep it confidentially and securely until you are 25 years old (or 26 years old if you were 17 when your last treatment ended), or for 11 years after the completion of treatment, whichever is longer.

We will then review if and when we can delete it. You can always ask for a copy of the information we hold for you, we can transfer it to another dentist or doctor at your request and you can ask us to stop using your personal information to send letters or contact you in other ways if you are no longer a patient at the practice.

When you reach 18 years of age the Privacy Notice about how we process your personal information will change to the adult version. This can be found on our website.

If you would like a copy of the information, we hold about you or if you have any other enquiries such as correcting an error in your information or providing a copy of your information to somebody else please contact:

The Information Governance Lead, Dr Dan Shaffer
 Pure Dentistry,
 399 Luton Road, Harpenden, Herts , AL5 3NF
 Email: info@puredentistry.co.uk ,
 Phone: 01582 713400.

How do we use your information?

The use of your personal information will only be for the original purpose of the collection of your personal information as agreed to, and in the event of further processing, for a purpose compatible with that original purpose.

We may use your personal information to:

- Provide services or content such as emails, electronic newsletters, or other services in which you expressed interest;
- Verify your identity to enable you access to our website to purchase products or services;
- Inform you of ongoing or new changes to our website;
- Inform you of products, services, promotions, new or relevant content, competitions, or other information you may find interesting;
- Respond to queries you may have;
- Develop your online profile;
- Develop your online membership/ membership profile;

- Use analytic services to understanding ongoing trends and patterns, so we may develop or improve on strategies as necessary for our operational purposes;
- Comply with security, administration and legal requirements.

Additionally, where necessary your information may be retained or transferred for legal purposes.

For example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorized user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research or for statistical analysis;
- For audit and record keeping purposes;
- In connection with legal proceedings.

Using your personal information for marketing purposes

Should we obtain your prior consent, your Personal Information may be used for marketing purposes, such as:

- Promoting our services.
- Marketing our upcoming events and products, or the upcoming events or products of listed third-parties.
- You have the right to request to be unsubscribed from our marketing, or request for us to desist from using your Personal Information for the purposes of marketing. We will provide the functionality for you to do this each time we send you marketing messages.

Disclosure of information

Your personal information may be disclosed to any 3rd parties. We have agreements in place to ensure that they comply with the privacy requirements as required by the POPI Act and GDPR.

We may also disclose your information:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights;
- For purposes of civil or criminal proceedings.

Information Security

We are legally obliged to provide adequate protection or security for the personal information we hold and to prevent unauthorised access and use of personal information, as reasonably possible.

We cannot however guarantee that your Personal Information will be 100% secure.

Our security policies and procedures include:

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

How we keep your information secure:

- Store Personal Information in The United Kingdom. Transfer PI to central database in UK and mirrored on secure servers in other countries. If other country doesn't have same or similar laws –

ensure equal protection through contract/ take necessary steps to ensure the same level of protection/ adequate protection.

· Not stored for longer than necessary to meet the requirements of the privacy policy/ for the purposes as described in the privacy policy/ original purpose of collection as described in the privacy policy.

Your Rights:

Access to Your Personal Information

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us and specify what information you require. You will be required to provide us with ID Documents prior to receiving access to your personal information.

Please note that any such access request may be subject to a payment of a legally allowable fee.

Correction of Your Personal Information

You have the right to request correction or deletion of your personal information where your personal information is inaccurate, irrelevant, excessive, out of data, incomplete, misleading or unlawfully obtained. We will require a copy of your ID document to confirm your identity prior to making changes to your personal information we hold about you.

Governing Law

This Privacy Policy shall and the contents thereof will be governed by the law of the United Kingdom. Any provision of this Privacy Policy deemed illegal and thus void and unenforceable will be severable to that extent without prejudice to any provision of this Privacy Policy not deemed the same way unless the opposite is held by a competent court with jurisdiction.

GDPR

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, Pure Dentistry Ltd.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a users computer or device.

Key principles of GDPR:

Our privacy policy embodies the following key principles; (a) Lawfulness, fairness and transparency, (b) Purpose limitation, (c) Data minimisation, (d) Accuracy, (e) Storage limitation, (f) Integrity and confidence, (g) Accountability.

Your individual rights

Under the GDPR your rights are as follows. You can read more about your rights in details here;

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;

- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR.

Internet cookies

We use cookies on this website to provide you with a better user experience. We do this by placing a small text file on your device / computer hard drive to track how you use the website, to record or log whether you have seen particular messages that we display, to keep you logged into the website where applicable, to display relevant adverts or content or refer you to a third party website.

Some cookies are required to enjoy and use the full functionality of this website.

We use a cookie control system which allows you to accept the use of cookies. Some cookies will be saved for specific time periods, whereas others may last indefinitely. Your web browser should provide you with the controls to manage and delete cookies from your device, please see your web browser options.

This policy refers to the term 'Cookie' which includes cookies, and other similar tracking technologies as defined in the EU e-privacy regulation.

By continuing to use this website without changing the settings, you consent to our use of cookies.

What is a Cookie?

A cookie is a small text file, downloaded to your computer or mobile device when visiting a website or application. The website or application asks your browser to store the cookie on your computer or mobile device. The cookie allows the website to recognize your actions and/ or preferences over time.

These are supported by most internet browsers; however, users may set their browsers to decline certain or specific types of cookies. Cookies may further be deleted at any time.

Why do we use cookies?

We utilize cookies to learn your interaction with our content, and thus to improve and tailor your experience when visiting our website.

For example:

- Some cookies may remember your language of preference.
- Some cookies may remember your behavioural preferences so these choices need not be made every time you access our website.
- Cookies may be used to determine your geolocation when calculating shipping costs, or travel distance to the nearest retailer stocking our goods.
- We may use cookies to provide you with tailored content, advertisements, offers, specials, targeted advertisements, or re-market products to you based on your interests.

What types of cookies do we use?

- First and Third-Party Cookies.
- Session Cookies.
- Persistent Cookies.

How are cookies used for advertising purposes?

Cookies and other relevant tracking technologies help us deliver relevant advertisements to you, in a more effective manner. They enable us to collect aggregated data, and performance reporting for advertisers. They allow us to determine what advertisements have been sent to you, thus enabling improved understanding and delivering of advertisements to you.

This may be opted out from, however in such an event, it will not prevent advertisements from being displayed to you, but rather prevent relevant advertisements based on your interests from reaching you.

How are third-party cookies used?

Some functionality on our website utilises third-party suppliers, for example through links to products not of ours. When visiting a page with embedded links to listed third-parties, these may contain third party cookies, to which we ask that you consult their Privacy Policies as well regarding their use of cookies.

How can I delete or block cookies from my computer?

You may choose to clock or delete all or specific types of cookies by clicking on our cookie preferences on our website. This will allow you to change your preferences for our website. Alternatively, you can consult the settings on your browser to allow you to change the preferences for our, or third-party websites.

It must be noted that most browsers automatically accept cookies, meaning you must actively consult your settings should you wish to block or delete cookies permanently. This may however affect the functionality of ours, or specific third-party websites as a result.

By using our website without deleting or rejecting cookies, you agree that we can place cookies that have not been deleted or rejected on your device.

The use of Google Analytics

Our website uses Google Analytics. This is a web analytics service, provided by Google Inc (Google). This service uses cookies, in line with the definition as provided in this Cookie Policy, in order to analyse how users interact with our website. This information generated will be transferred to and stored by Google in the United States of America. This information will be used by Google to evaluate your use on this website, and compile reports on the activity on our website for website operators, and provide other services relating to website activity and internet usage.

Google may transfer this information to third-parties when required by law, or where third parties process the information on behalf of Google under a processing agreement. Your IP address will not be associated by with other data stored or held by Google.

You may refuse the use of cookies by changing the settings on your browser, or through the functionality as provided through our website (add link to cookie settings). This may however affect the full functionality of this website.

By continuing to use this website, without changing cookie preferences on this site, or on your browser, you consent to the use of cookies and the processing of data produced as a result, by Google for the above mentioned purposes.

Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information. Our methods meet the GDPR compliance requirement.

Fair & Transparent Privacy Explained

We have provided some further explanations about user privacy and the way we use this website to help promote a transparent and honest user privacy methodology.

Sponsored links, affiliate tracking & commissions

Our website may contain adverts, sponsored and affiliate links on some pages. These are typically served through our advertising partners; Google AdSense, eBay Partner Network, Amazon Affiliates, or are self served through our own means. We only use trusted advertising partners who each have high standards of user privacy and security. However we do not control the actual adverts seen / displayed by our advertising partners. Our ad partners may collect data and use cookies for ad personalisation and measurement. Where ad preferences are requested as 'non-personalised' cookies may still be used for frequency capping, aggregated ad reporting and to combat fraud and abuse.

Clickable sponsored or affiliate links may be displayed as a website URL or as a titled text link like this: [How To Start A Blog](#).

Clicking on any adverts, sponsored or affiliate links may track your actions by using a cookie saved to your device. You can read more about cookies on this website above. Your actions are usually recorded as a referral from our website by this cookie. In some cases we may earn a small commission from the advertiser or advertising partner, at no cost to you, whether you make a purchase on their website or not.

We use advertising partners in these ways to help generate an income from the website, which allows us to continue our work and provide you with the best overall experience and valued information.

If you have any concerns about this we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.

Email marketing messages & subscription

Under the GDPR we use the consent lawful basis for anyone subscribing to our newsletter or marketing mailing list. We only collect certain data about you, as detailed in the "Processing of your personal data" above. Any email marketing messages we send are done so through an EMS, email marketing service provider. An EMS is a third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to

unsubscribe or manage your preferences, you can also unsubscribe from all MailChimp lists, by following this link, otherwise contact the EMS provider.

We hold the following information about you within our EMS system;

- Email address
- I.P address
- Subscription time & date

Digital Content rights

Download of STL files or other digital content is authorised for personal use. A chargeable distribution agreement can be negotiated and agreed with Pure Dentistry Ltd for authorised sharing and distribution by email, download link or any other electronic marketing or distribution of content. Please email through the contact page for further details.

Resources & further information

- [Overview of the GDPR - General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [The Guide to the PECR 2003](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)
- [Google Privacy Policy](#)
- [Linkedin Privacy Policy](#)
- [Mailchimp Privacy Policy](#)

PRIVACY NOTICE

The practice aims to meet the requirements of the Data Protection Act 2018, the United Kingdom General Data Protection Regulation (UK GDPR), the guidelines on the Information Commissioner's (ICO) website as well as our professional guidelines and requirements.

The data controller is Pure Dentistry Limited, the Information Governance Lead is Shahnal Shah.

This Privacy Notice is available on the practice website at www.puredentistry.co.uk, at reception or by email if you contact info@puredentistry.co.uk or by calling 01582 713400.

You will be asked to provide personal information when joining the practice. The purpose of processing your personal data is to provide you with optimum dental health care and prevention.

The categories and examples of data we process are:

- Personal data for the provision of dental health care
- Personal data for the purposes of providing treatment plans, recall appointments, reminders or estimates
- Personal data such as details of family members for the provision of health care to children or for emergency contact details
- Personal data for the purposes of employed and self-employed team members employment and engagement respective
- Personal data for the purposes of [direct mail/email/text/other] to inform you of important announcements or about new treatments or services
- Personal data - IP addresses so that we can understand our patients better and inform our marketing approach as well as improve the web site experience
- Special category data including health records for the purposes of the delivery of health care and meeting our legal obligations
- Special category data including health records
- Special category data to meet the requirements of the Equality Act 2010
- Special category data details of criminal record checks for employees and contracted team members

We minimise the data that we keep, and do not keep it for longer than necessary.

We never pass your personal details to a third party unless we have a contract for them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or to secondary care such as a hospital, we will gain the individual's permission before the referral is made and the personal data is shared.

- Personal data is stored in the UK whether in digital or hard copy format
- Personal data is obtained when a patient joins the practice, when a patient is referred to the practice

For full details or where your data is stored, please ask to see Information Governance Procedures (M 217C). We have established the following lawful bases for processing your data: Our lawful bases for processing personal data:

- The legitimate interests of the dental practice
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract
- Consent of the data subject
- To comply with our legal obligations

Our Article 9 conditions for processing special category data:

- Processing is necessary for health care purposes
- Processing necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained
- We obtain consent of the data subject to process criminal record checks

The reasons we process the data include:

- To maintain your contemporaneous clinical record
- To provide you with dental treatment, prevention, and oral health advice
- To carry out financial transactions with you
- To send your personal data to the General Dental Council or other authority as required by law
- To communicate with you as and when required including appointment reminders, treatment plans, estimates and other communications about your treatment or the practice
- To communicate with your next of kin in an emergency
- If a parent or carer to communicate with you about the person you parent or care for
- To refer you to other dentists or doctors and health professionals as required
- To obtain criminal record disclosures for team members
- For debt recovery
- To continually improve the care and service you receive from us

The personal data we process includes:

Your name, address, gender, date of birth, NHS number, medical history, dental history, family medical history, family contact details, marital status financial details for processing payment, your doctor's details and details of treatment at the practice. We may process more sensitive special category data including ethnicity, race, religion, or sexual orientation so that we can meet our obligations under the Equality Act 2010, or for example to modify treatment to suit your religion.

The retention period for special data in patient records is a minimum of 11 years and may be longer for complex records or to meet our legal requirements. The retention period for other personal data is 2 years after it was last processed. Details of retention periods are available in the Record Retention (M 215) procedure available from the practice.

We obtain your personal details when you enquire about our care and service, when you join the practice, when you subscribe to our newsletter or register online, when you complete a registration or medical history form and when another practitioner refers you for treatment at our practice.

Occasionally patients are referred to us from other official sources such as NHS clinics or hospitals. You have the following personal data rights:

- The right to be informed about the collection and use of your personal data
- The right of access – to have a copy of the data we hold about you. Generally, we will not charge for this service
- The right to rectification - to correct the data we have if it is inaccurate or incomplete
- The right to deletion of your personal data (clinical records must be retained for a certain time period)
- The right to restrict processing of your personal data
- The right to data portability – to have your data transferred to someone else
- The right to object to the processing of your personal data
- Rights in relation to automated decision making and profiling

Further details of these rights can be seen in our Information Governance Procedures (M 217C) or at the

[Information Commissioner's website](#). Here are some practical examples of your rights:

- If you **are** a patient of the practice, you have the right to withdraw consent for important notifications, newsletters, surveys or marketing. You can inform us to correct errors in your personal details or withdraw consent from communication methods such as telephone, email or text. You have the right to obtain a free copy of your patient records within one month
- If you are **not** a patient of the practice you have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. You can also withdraw consent from communication methods such as telephone, email or text

We have carried out a Privacy Impact Assessment in Sensitive Information Map, PIA and Risk Assessment (M217Q) and you can request a copy from the details below. The details of how we ensure security of personal data is in our Security Risk Assessment (M 217M) and Information Governance Procedures (M 217C).

Comments, suggestions and complaints

Please contact the IG Lead at the practice for a comment, suggestion or a complaint about your data processing at info@puredentistry.co.uk, or 01582 713400 or by writing to or visiting the practice at 399 Luton Road, Harpenden, Hertfordshire, AL5 3NF. We take complaints very seriously. If you are unhappy with our response or if you need any advice, you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113, you can also [chat online with an advisor](#). The ICO can investigate your claim and take action against anyone who's misused personal data. You can also visit their website for information on [how to make a data protection complaint](#).

Related practice procedures

You can also use these contact details to request copies of the following practice policies or procedures:

- Data Protection and Information Security Policy (M 233-DPT), Consent Policy (M 233-CNS)
- Sensitive Information Map, PIA and Risk Assessment (M 217Q), Information Governance Procedures (M 217C), Record Retention (M 215)

If you have an enquiry or a request, please contact the Information Governance Lead:

Pure Dentistry, 399 Luton Road, AL5 3NF info@puredentistry.co.uk

Phone: 01582 713400.

Thank you.

Data Opt-Out Policy

How the NHS and care services use your information

Pure Dentistry is one of many organisations working in the health and care system to improve care for patients and the public. Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment. The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- Improving the quality and standards of care provided
- Research into the development of new treatments
- Preventing illness and diseases
- Monitoring safety
- Planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information is not needed. You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care. To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and <https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement. NHS Health and care organisations must have systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care.

Our practice only uses your personal health data to provide individualised care to you and does not disclose your data for any other purposes. The national data opt-out does not apply to our usage of your data and we are compliant with the policy.

Processing of Staff and Candidates' Information

This section explains how Pure Dentistry processes the information of staff and applicants for job roles within the practice.

What data do we have?

So that we can provide a safe and professional service, we need to keep certain records about our team members. We may record the following types of data:

- Your basic details and contact information e.g., your name, address, date of birth, National Insurance number and next of kin
- Your financial details e.g., details so that we can pay you, insurance, pension and tax details
- Your training records

We also record the following data which is classified as “special category”:

- Health and social care data about you, which might include both your physical and mental health data – we will only collect this if it is necessary for us to know as your employer, e.g., fit notes or in order for you to claim statutory maternity/paternity pay
- We may also, with your permission, record data about your race, ethnic origin, sexual orientation, or religion

As part of your engagement with the practice, you may be required to undergo a Criminal Record Check. This information is not kept for longer than is necessary—usually not more than 6 months following the recruitment decision, unless a dispute is raised or, in exceptional circumstances.

Why do we have this data?

We require this data so that we can contact you, pay you and make sure you receive the training and support you need to perform your job. By law, we need to have a lawful basis for processing your personal data.

We process your data because:

- We have a legal obligation under UK employment law
- We have a legitimate interest in processing your data – for example, for administration of training or learning course or emergency planning etc. These legitimate interests will be customary, or necessary for operational, administrative, HR and recruitment purposes and to otherwise manage employment relationship and interaction between employees
- We are required to provide data to our regulator, [CQC/NHS/RQIA/HIS/HIW], as part of our public interest obligations
- We are required to do so in our performance of another public task
- We process your special category data because it is necessary for us to process requests for sick pay or maternity pay
- If we request your criminal records data, it is because we have a legal obligation to do this due to the type of work you do. This is set out in the Data Protection Act 2018 and the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
- We may also process your data with your consent. If we need to ask for your permission, we will offer you a clear choice and ask that you confirm to us that you consent. We will also explain clearly to you what we need the data for and how you can withdraw your consent

Where do we collect your data from?

As your employer we need to receive specific data about you. This is collected from or shared with:

- You or your legal representative(s)
- Third parties – for example this could include references from your previous job

We do this face to face, via phone, via email, via our website, via post, via application forms, via apps [delete or insert as appropriate all of the methods you use to communicate with your team members]

How do we share your data?

- Third parties are organisations we have a legal reason to share your data with. These include:
- HMRC
- Our pension and healthcare schemes
- External payroll provider
- Organisations we have a legal obligation to share information with i.e., for safeguarding, the CQC
- The police or other law enforcement agencies if we have to by law or court order

How long do we hold your data?

The retention period for staff records is 6 years, however, certain information relating to team members may lawfully be kept for longer. Team members should refer to Record Retention (M 215) for further details on how this practice keeps and disposes of staff data. Application forms and interview notes for unsuccessful candidates are kept for one year.

Your rights

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner's Office (ICO) as the relevant supervisory authority. For more information on your personal data rights, you can access information and advice on the ICO's website. You can request a copy of your personal file by contacting the Information Governance Lead.