

Precision Spine Privacy Policy

We (Precision Spine) can be contacted relating to any matters of privacy and data collection.

Contact us:

Precision Spine
Consulting Rooms
81 Harborne Road
Birmingham
B15 3HG
assistant@precisionspine.co.uk

0121 647 4843

General Information on How we Use and Store Your Data

Mr Matthew Newton Ede is the sole responsible officer for data protection and is contactable at the address above.

We will use your personal and sensitive data (data relating to health) in order to carry out duties directly related to providing health services to you. We will for example, store medical information about you, send emails about your care, complete forms for you, write letters to you, your doctor and others. We will restrict this information to that which is necessary to carry out our duties to you. We will send information to bodies concerned with your care. This may include other organisations and other healthcare professionals.

For those that opt-in to "Level 2 – British Spinal Registry": Details on how this information will be used and the privacy policy associated with it can be found here :

<http://www.britishspineregistry.com/app/download/22683233/BSR+patient+consentinfo+-+Feb18.pdf>

Or: https://docs.wixstatic.com/ugd/29e9b2_189060225f4646a4a2aded55c560f4c7.pdf

For those that opt-in to "Level 3 – Enhanced": We may use your data for additional purposes. We may share your data with third parties who are not directly related to your care. However this data will be anonymised (for example, the size of your scoliosis curve and the implants we used, but nothing that could identify you -your name address etc). We will never sell your contact or personal details (name, address, email etc.)

We will share information relating to your care in order to inform others concerned with your health. It may not be immediately apparent why we are sharing with others, but we do so in order to ensure others who are concerned with your health are appropriately informed

The processing of your data is lawful. We will presume your consent to sharing information with others, based on your acceptance of this policy.

We have a legitimate interest in storing and processing and sharing your data. We have a legitimate interest to reasonable use of your data in pursuit of our fees.

The types of data we hold on you

- Basic personal information (Name, date of birth, address, email etc)
- Medical data (specific medical diagnoses, sensitive personal information)
- Family history data (marital status, detail about relatives and their health)
- Details about your employment
- Financial information including credit card details, bank details. This financial data is used solely for settlement of fees.

Cloud Storage

Where information is transferred outside of the EU (for example onto cloud based servers in the United States), all servers used are certified by the EU – US Privacy Shield so as to comply with European Union Data Protection Directive 95/46/EC.

Privacy Shield Certification (EU – US transfer) for all the platforms we use can be found here:

https://docs.wixstatic.com/ugd/29e9b2_7030c9a86a1841308cab7b826dbdc32b.pdf

Further information (issued by NHS Digital) about the acceptance of trusted EU-US data transfer arrangements can be found here:

https://docs.wixstatic.com/ugd/29e9b2_a026b08447ed47b4a8e99d75f2248e53.pdf

Retention Periods

The retention periods for the personal data:

Children (age 17 and younger): *at time of completing treatment* until age 26 or 8 years after death.

Adults: 8 years after completion of treatment

Further guidance about retention periods of health data can be found here:

https://docs.wixstatic.com/ugd/29e9b2_0abf6c25d1844dec8c19a14bb3832482.pdf

Your rights and duties under GDPR

Under GDPR individuals have the following rights with regard to their data and its processing. You have the following rights and if you wish to discuss or exercise any of these rights then please contact us using the routes at the top of Page 1 of this document. You have the following rights and duties:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.
9. The right to withdraw consent.
10. The right to lodge a complaint with a supervisory authority. The supervisory authority is the Information Commissioners Office (www.ico.org.uk)
11. The source of the personal data (if the personal data is not obtained from the individual it relates to).
12. You have a duty to provide me (and the people working for me) with accurate information about you and your health, in order for us to make accurate and appropriate decisions about your care.

When we provide information to you

We provide you with privacy information at the time we collect their personal data from them.

If we obtain personal data from a source other than the individual it relates to, we provide them with privacy information:

- within a reasonable of period of obtaining the personal data and no later than one month;
- if we plan to communicate with the individual, at the latest, when the first communication takes place; or
- if we plan to disclose the data to someone else, at the latest, when the data is disclosed.

How we provide it

We provide the information in a way that is:

- concise;
- transparent;
- intelligible;
- easily accessible; and
- uses clear and plain language.

Changes to the information

We regularly review and, where necessary, update our privacy information.

If we plan to use personal data for a new purpose, we update our privacy information and communicate the changes to individuals before starting any new processing.

Best practice – drafting the information

We undertake an information audit to find out what personal data we hold and what we do with it.

We put ourselves in the position of the people we're collecting information about.

We carry out user testing to evaluate how effective our privacy information is.