

# **PRIVACY POLICY**

This policy describes how we collect and use personal data about you. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

## **ABOUT US**

Guildford Medical Group Limited (trading as One Orthopaedics) is a private medical practice specialising in orthopaedic and sports injury care.

For the purpose of the Data Protection Legislation and this policy, we are the 'data controller'. This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this privacy policy.

If you would like further information about any of the matters in this Privacy Policy or have any other questions about how we collect, store or use your personal information, please contact us by:

Email: [office@oneorth.co.uk](mailto:office@oneorth.co.uk)

Post: One Orthopaedics, Mount Alvernia, Harvey Road, Guildford, GU1 3LX

## **HOW WE MAY COLLECT YOUR PERSONAL DATA**

We obtain personal data about you from: You directly

Your GP or referring clinician, your consultant and other health professionals involved in your care.

Your private medical insurance provider

Your current or former employer (if they provide your healthcare benefit)

In addition to the information held on your patient record, we may collect information directly from you when participate in a Patient Reported Outcomes survey or when you complete a form on our website.

## **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

In order to provide effective care and treatment for you, we collect and store the following personal information about you:

Personal details including your full name, title, date of birth and gender

- Your address and contact details, including email address and telephone numbers.
- Emergency contact details and/or next of kin
- Your National Health Number
- Details about other clinicians involved in your care or referral, for example your GP or Physiotherapist
- Your medical insurance details or information regarding other organisations responsible for funding your care
- Our correspondence and communications with you

**We also collect and hold special category personal data which includes:**

- Details of your current and previous physical and mental health. This may include treatment you have received elsewhere and by other clinicians
- Medical records including past treatments, results of investigations, tests and scans
- Imaging such as X-rays, ultrasound and MRI scans and their reports, photographs and videos
- Genetic or biometric data relating to you

**HOW WE USE PERSONAL DATA WE HOLD ABOUT YOU**

The personal data will be used for the following purposes:

- To ensure that you receive appropriate clinical care and treatment
- To arrange appointments, scans and procedures
- To respond to your phone calls, emails and letters
- To invoice you for and collect payment of our fees
- To comply with legislation including the Competition & Markets Authority (CMA) Private Healthcare Order
- To inform your GP or referring clinician of details of your treatment
- To inform another clinician of details of your treatment with One Orthopaedics if you are being referred on for further treatment
- To inform a National Registry (such as the National Joint Registry) about your surgery
- To transfer your personal details and treatment details to your consultant should that consultant decide to work independently of One Orthopaedics

If you would prefer us not to share your information with other clinicians, please notify us.

**DATA RETENTION**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it is collected. Our retention periods are in line with the Information Governance Alliance Records Management Code of Practice for Health and Social Care 2016.

**CHANGE OF PURPOSE**

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.

## **DATA SHARING**

We will share your personal data with third parties where they are involved in your health care, where it is necessary to administer the relationship between us or where we are required by law.

### **Third parties involved in your health care**

The third parties involved in your healthcare include:

- Consultants, anaesthetists, radiologists and other health professionals, such as physiotherapists
- External companies that provide services as part of your care pathway, such as blood tests, radiological imaging, archiving and reporting.
- Specialist companies that provide bespoke medical devices Your GP and other referring clinicians
- Anyone you have asked us to communicate with or whose details you have provided as an emergency contact.

### **Third parties involved in the administration of your care**

The third parties involved in the administration of your care include:

- Providers of practice management and secretarial services
- Providers of clinical and non-clinical software
- Providers of document scanning and storage facilities
- Private medical insurers and other payers of fees (including current and former employers)
- Debt collection agencies if your bill is not paid in accordance with our credit terms. The information shared would only include contact details and copy invoices and would not include your medical records
- Surgical outcomes registries

Additionally, pseudonymised, anonymised and aggregated data may be shared as part of our quality assurance process or be passed to National Registries who monitor the outcome of treatment provided

We will never use your personal data for marketing purposes without your consent and we will never sell your personal data to a third party.

All our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

## **Sharing data with your consent**

With your consent we may disclose your personal information to other parties, for example to a company handling a claim on your behalf

### **Other third parties**

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

### **Transferring personal data outside the European Economic Area (EEA)**

We will not transfer the personal data we collect about you outside of the EEA

## **DATA SECURITY**

We have put in place commercially reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

### **Your rights in connection with personal data**

Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights, please email [office@oneorth.co.uk](mailto:office@oneorth.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office Wycliffe House  
Water Lane  
Wilmslow

Cheshire SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745 Website - <https://ico.org.uk/concerns>