

ACUHEALTH PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your treatments with us. This notice applies to you if you have registered as a patient at Acuhealth. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to we, our or us in this privacy notice are to Acuhealth.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but the owner Dr Mei Xing has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you register as a patient at Acuhealth, we may obtain personal information about you, such as information regarding your:

- Personal contact details that allows us to contact you directly such as name, title, email addresses and home address;
- telephone numbers;
- Date of birth;
- Gender;
- Occupation;
- Weight/Height;
- Marital Status;
- GP names, telephone numbers and address;
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Any credit/debit card and other payment details you provide so that we can receive payments from you;
- Details of the financial transactions with you;
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- Records of your attendance at any events hosted by us;
- Images in video and/or photographic form and voice recordings;
- Your marketing preferences so that we know whether and how we should contact you.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;

- We may not collect all of the above types of special category personal information about you.

In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our patients when you book an appointment and register at the clinic.

We also collect personal information about you when you register an account on our website or send enquiries via our website.

We may also collect personal information about you from any third party references you provide as part of the initial registration procedure.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information Used	Lawful basis
To make appointment bookings and send reminders	All contact details	This is necessary to enable us to properly administer the booking system ensure your treatment is provided on time and effectively.
Retention of records	All the personal information we collect	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer the appointments and ensure you receive the best treatments.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
To send you information which is beneficial for your	All contact details, transaction and payment information.	This is necessary to enable us to provide better service to you.

treatments	Records of your medical history, treatment plans, and interactions with us.	
To send you other marketing information we think you might find useful, or which you have requested from us, including our newsletters, open days, special events, special promotions	Contact details and marketing preference	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interaction with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
The security of our IT systems	Your usage of our IT systems and online portals	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and patients behaviour	Records of your attendance at any events hosted by us	We have a legitimate interest in doing so to ensure that we have an enclosed community group to share best practice.
To comply with health and safety requirements, and other legal obligations	Records of treatments and medical history and other information about your criminal convictions and offences	<p>We have a legal obligation and a legitimate interest to provide you and other patients with a safe environment.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at info@acuhealth.org.uk

You can also unsubscribe from our marketing by clicking on the ‘unsubscribe’ link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you;
- Any other medical institutions that we may refer you to seek further tests or treatments;
- Other service providers: for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including WordPress website, video- and teleconference services);
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

7. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements.

Generally, where there is no legal requirement we retain all physical and electronic records for a period of 8 years after your last contact with us or the end of your treatment.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "Contacting us" section below.

8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider;
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision

making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information

Commissioner's website at <https://ico.org.uk/for-the-public>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email

info@acuhealth.org.uk

Version dated 22nd May 2018