

Data Controller: 152 Harley Street Ltd, 3rd Floor, 152 Harley Street, London, W1G 7LH, UK.

Data Subjects: Patients; Adults and Children.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this Privacy Policy to inform you of the type of data that we process about you. We also include within this policy the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data. This policy applies to current and former patients.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

1. Processing is fair, lawful and transparent
2. Data is collected for specific, explicit and legitimate purposes
3. Data collected is adequate, relevant and limited to what is necessary for the purposes of processing
4. Data is kept accurate and up-to-date. Data which is found to be inaccurate will be rectified or erased without delay
5. Data is not kept for longer than is necessary for its given purpose
6. Data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
7. Data of persons under the age of 18 is consented for processing by Parent/Legal Guardian of that person
8. We comply with the relevant GDPR procedures for international transferring of personal data where necessary

B) TYPES OF DATA HELD

We keep several categories of personal data on our patient's in order to carry out safe effective services and also to ensure we provide the

highest quality of healthcare possible. We keep this data in a digital medical record file on a medical software application. We also hold some data within our secure internal computer systems, for example, our clinic calendar system provided by Microsoft Office 365. We use your personal data to deliver services including clinical treatment such as surgery or laser, radiology for imaging and histopathological testing.

Specifically, we hold the following types of data, as appropriate to your status as a patient at 152 Harley Street:

- a) personal details such as name, address, email address, phone number (by way of registration form);
- b) name and contact details of your next of kin (by way of registration form);
- c) information of any disability you have or other medical information to aid your wellbeing and safety whilst you are in the clinic (by way of registration form and information shared with the clinic by your primary consultant/doctor/allied professional);
- d) clinical records such as operation notes, wound care records, medical reports, radiology reports, pictures or photographs supplied by you.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during your time at the clinic.

In some cases, we will collect data about you from third parties, such as your primary consultant/doctor/allied professional by way of referrals for radiology or treatment bookings. These third parties are data controllers in their own right and will seek consent from you to share your information with us in order to provide the treatment that you require.

Personal data is kept in digital medical records and on internal secure company systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively provide a safe service to you.

The information below categorises the types of data processing, appropriate to your status as a patient, that we undertake including the lawful basis we rely on.

Activity requiring your data	Lawful basis
Provide safe effective high-quality treatment and care e.g. using your legal name, date of birth, contact details including next of kin	Vital Interests
Making reasonable adjustments for disabled persons or persons with specific medical requirements	Vital Interests
Sharing your personal data with other health professionals involved in your treatment e.g. anaesthetists, laboratories for sample testing, radiographers for medical reporting of images, your primary consultant/doctor/allied professional for the purposes of keeping your medical record up-to-date	Consent
Sharing your personal data with pharmacies where prescriptions are required for the delivery of certain drugs for you	Consent
Where necessary sharing your personal data with insurance companies or an external billing company for the purpose of debt collection	Legitimate Interests
Taking payment from you using external credit and debit card provider Worldpay Card Services (no credit/debit card details are stored on any systems at 152 Harley Street Ltd.)	Consent

E) SHARING YOUR PERSONAL DATA

Owing to the nature of the activity for which we possess your personal data we may need to share your personal data with other health authorities, legal authorities, ambulance services, other health professionals involved in your care. With your consent and subject to the sharing protocols about how it will be used, we may also share your information with social services. Before any of your personal data can be sent outside the EU we must comply with strict conditions as laid down by the law.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with certain data may mean that we are unable to fulfil the expected service or treatment that you require.

G) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes such as external backup facilities, anti-virus and anti-hacking software, staff training programmes, medical record auditing and information management audits to guard against this.

H) RETENTION PERIODS

Data retention periods for a healthcare facility such as 152 Harley Street are set by the law. Our retention period for medical records for adults is 8 years after the conclusion of treatment. Records for children and young people are retained until the patient is 25 years of age or 26 years of age if the patient is 17 at the time of treatment.

I) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. At 152 Harley Street, no decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

J) YOUR RIGHTS

The GDPR is an EU law that protects your personal data. You have the following rights in relation to the personal data we hold on you:

- a. the right to be informed about the data we hold on you and what we do with it;
- b. the right of access to the data we hold on you;
- c. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d. the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e. the right to restrict the processing of the data;
- f. the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g. the right to object to the inclusion of any information.

Any such requests for access to your personal data should be made by contacting us directly at our practice. Details of our Data Protection Officer can be found at the end of this policy. We will ensure that when you ask about your personal data we will respond promptly to your request. 152 Harley Street has the ability to respond to such requests within 24 hours.

K) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data. Consent for persons under the age of 18 is sought from the parent/legal guardian of that person.

L) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745. We also urge you to notify our Data Protection Officer (details below).

M) DATA PROTECTION COMPLIANCE

Our Data Protection Officer is: Professor David Dunaway CBE,
Company Director, 02074673004

Email: david.dunaway@152harleystreet.com

Our Information Commissioners Office Registration Number is:
ZA120547