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### **Privacy Policy**

Healthcare4kids is committed to protecting and respecting your privacy and understands that your personal information is entrusted to us. We are committed to complying with UK's Data Protection Law and EU General Data Protection Regulation (GDPR).

This Privacy Policy tells you what to expect when we collect, use, store and disclose personal information that we hold about you and your rights in relation to that information.

Please read the following carefully to understand how we process your personal information. By visiting our website, providing your personal information and using our services you agree that we can use your personal information for the purposes described in this Privacy Policy.

The Privacy Policy does not cover the links within our website linking to other websites and we encourage you to read the Privacy Policies on the other websites you visit.

#### **Definitions**

When we refer to 'we', 'us', 'our', we mean Healthcare4kids.

When we refer to 'customer', we mean the patient's parent, guardian or carer.

When we refer to 'patient', we refer to the individual being seen by a medical professional at Healthcare4kids. Patients of Healthcare4kids are mainly children up to the age of 18 years.

When we refer to 'personal information', we mean information which relates to or is about the 'patient' and/or 'customer' or is about the 'patient' or 'customer' from which they can be identified.

When we refer to 'you', we mean the 'patient' and/or 'customer'.

## Processing your personal information

When we refer to personal data in this Privacy Policy, we mean information that can or has the potential to identify you as an individual. We may hold and use personal data about you as a customer, a patient or in any other capacity, for example, when you visit our website, complete a form, access our services or speak to us. Depending on what services you receive from us this may include sensitive personal data such as information relating to your health.

Personal data we collect from you may include the following:

- information that you give us when you enquire or become a customer or patient of us including name, address, contact details (including email address and phone number)
- details of referrals, quotes and other contacts and correspondence we may have had with you or about you
- details of services and/or treatment you have received from us or which have been received from a third party and referred on to us
- notes and reports about your health and any treatment and care you have received and/or need
- patient feedback information you provide
- information about complaints and incidents
- information you give us when you make a payment to us, such as financial or medical insurance details
- other information received from other sources, such as information provided by other companies who have obtained your permission to share information about you.
- where you have named someone as a contact for the patient and provided us with personal data about that individual, it is your responsibility to ensure that that individual is aware of and accepts the terms of this Privacy Policy.

The data that we request from you may include sensitive personal data. This includes information that relates to the mental or physical health or racial or ethnic origin, and includes children's data. By providing us with sensitive personal data, you give us your explicit consent to process this sensitive personal data for the purposes set out in this Privacy Policy.

We may collect personal data about you if you:

- visit our website
- enquire about any of our services
- register to be a customer or patient with us or book an appointment
- fill in a form or survey for us
- contact us, for example by email, telephone or social media.

We may collect personal data about you from third parties such as:

- we have a number of independent third parties acting on our behalf who may collect personal data from you to allow us to carry out the services we offer e.g. a receptionist from one our clinic venues collecting personal data from you which is subsequently shared with Healthcare4kids;
- we carry out work following a referral from NHS and for the continuity of your care we may be passed medical information usually in the form of a referral for the purposes of your treatment with Healthcare4kids or a third party medical professional;
- insurance providers will pass Healthcare4kids personal data of patients who
  have commenced a claim and require medical treatment with Healthcare4kids.
  This will normally be in the form of a referral and may consist of basic details
  e.g full name, date of birth, address, contact number and email address and
  the reason for the referral including any relevant background information, tests
  and results.

# Uses made of your personal information

Your personal data will be kept confidential and secure and will only be used for the purpose(s) for which it was collected and in accordance with this Privacy Policy, applicable Data Protection Laws, clinical records retention periods and clinical confidentiality guidelines.

Sensitive personal data related to your health will only be disclosed to those involved with your treatment or care, or in accordance with UK laws and guidelines of professional bodies or for the purpose of clinical audits (unless you object). Further details on how we use health related personal data are given below:

- enable us to carry out our obligations to you including relating to the provision by us of services or treatments to you and related matter such as, billing, accounting and audit
- provide you with information or services that you request from us
- notify you about changes to our services
- respond to requests where we have a legal or regulatory obligation to do so
- check the accuracy of information about you and the quality of your treatment or care, including auditing medical and billing information for insurance claims as well as part of any claims or litigation process
- support your doctor or other healthcare professional
- assess the quality and/or type of care you have received (including giving you
  the opportunity to complete customer satisfaction surveys) and any concerns
  or complaints you may raise, so that these can be properly investigated
- to conduct and analyse market research
- to ensure that content from our website is presented in the most effective manner for you and for your computer.

Retention schedules for personal information for children is eight years after their 18<sup>th</sup> birthday.

# Security of your personal information

We process personal data we hold about you in a manner that ensures its security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. We ensure that appropriate technical or organisational measures are used.

The transmission of information via the internet is not completely secure and we cannot guarantee the security of your information transmitted to our website; any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain medical reports/letters, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

### Disclosure of personal information

We may disclose your personal information (to the extent necessary) to certain third party organisations that we use to support the delivery of our services. This may include the following:

- organisations providing IT systems support and hosting in relation to the IT systems on which your information is stored,
- third party debt collectors for the purposes of debt collection,
- third party service providers for the purposes of storage of information and confidential destruction
- third parties to process your personal information on our behalf.

Where a third party data processor is used, we ensure that they process information in accordance with our confidentiality and security requirements as well as in accordance with data protection requirements.

We may also disclose your personal information where we are required by law.

Sensitive personal data (including information relating to your health) will only be disclosed to third parties in accordance with this Privacy Policy. That includes third parties involved with your treatment or care, or in accordance with UK laws and guidelines of appropriate professional bodies. Where applicable, it may be disclosed to any person or organisation who may be responsible for meeting your treatment expenses or their agents. It may also be provided to external service providers and regulatory bodies (unless you object) for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

Medical professionals working for Healthcare4kids: We share clinical information about you with our medical professionals as we think necessary for your treatment. Medical professionals working with us might be our employees, or they might be independent medical professional in private practice. In the case of independent medical professional, the medical professional is the data controller of your personal data, either alone or jointly with us and will be required to maintain their own records in accordance with Data Protection Laws and applicable clinical confidential guidelines and retention periods. Where that is the case, we may refer you to that medical professional to exercise your rights over your data. Our contracts with medical professionals require them to cooperate with those requests. In all circumstances, those individual medical professionals will only process your personal data for the purposes set out in this Privacy Policy or as otherwise notified to you.

Independent consultants/practitioners in private practice: If we refer you for treatment to independent consultants/practitioners in private practice, we will share with the person or organisation that we refer you to, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Your GP: We may also share information about your treatment with your GP. You can ask us not to do this, in which case we will respect that request if we are legally permitted to do so, but you should be aware that it can be potentially very dangerous and/or detrimental to your health to deny your GP full information about your medical history, and we strongly advise against it.

Your insurer: We share with your medical insurer your personal information including membership number and authorisation code if available, date of consultation(s) and cost. We provide only the information to which they are entitled.

The NHS: If you are referred to us for consultation/treatment by the NHS, we will share the details of your consultation/treatment with the part of the NHS that referred you to us, as necessary to perform, process and report back on that consultation/treatment. If we refer you for consultation/treatment to the NHS, we will share with the NHS, the clinical and administrative information we consider necessary for that referral. It will always be clear when we do this.

Medical regulators: We may be requested – and in some cases can be required - to share certain information (including personal data and sensitive personal data) about you and your care with medical regulators such as the General Medical Council, for example if you make a complaint, or the conduct of a medical professional involved in your treatment is alleged to have fallen below the appropriate standards and the regulator wishes to investigate. We will ensure that we do so within the framework of the law and with due respect for your privacy.

In an emergency and if you are incapacitated, we may also process your personal data (including sensitive personal data) or make personal data available to third parties on the basis of protecting your 'vital interest' (i.e. your life or your health).

### Access and updating your personal information

Under the General Data Protection Regulation (GDPR) you have the right to access your personal data and supplementary information. You can make a 'subject access request' by emailing the Data Protection Officer at <a href="mailto:office@healthcare4kids.co.uk">office@healthcare4kids.co.uk</a> or writing to:

Data Protection Officer Healthcare4kids 9 Bridge Street Barford Warwick CV35 8EH

Following your request we will:

- verify your identity
- review the personal data and supplementary information and if approved\* send copies of the information by preferred means (ie electronically/recorded delivery), and
- respond to a request within one month.

Your request may be subject to a small administration fee. Copies of medical reports will be re-sent to the addressee without a charge.

\*there may be exceptions to accessing certain information to protect the rights of others.

You have the right to have your personal data that we hold about you corrected and updated if it is factually inaccurate. Please note that it is important to understand that this right does not extend to matters of professional opinion, such as medical diagnoses.

If your personal data has changed such as contact information (e.g. email address, postal address, phone number, GP) please get in contact with Healthcare4kids by emailing <a href="mailto:becky@healthcare4kids.co.uk">becky@healthcare4kids.co.uk</a> or writing to:

Becky Freeman Healthcare4kids 9 Bridge Street Barford Warwick CV35 8EH

If you are not satisfied with how we handle your request, you can contact the Information Commissioner's Office on 0303 123 1113 or visit their website (www.ico.org.uk).

#### Use of cookies

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests.

The cookies used on Healthcare4kids website have been categorised based on the categories found in the ICC UK Cookie guide.

### Category 1: strictly necessary cookies

These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website.

Your consent is not required for the delivery of those cookies which are strictly necessary to provide services requested by you.

We use this type of cookies on our website.

#### Category 2: performance cookies

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Web analytics that use cookies to gather data to enhance the performance of a website fall into this category. For example, they may be used for testing designs and ensuring a consistent look and feel is maintained for the user. This category does not include cookies used for behavioural/ targeted advertising networks.

We use this type of cookies on our website.

#### Category 3: functionality cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or

commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

We use this type of cookies on our website.

### Category 4: targeting cookies or advertising cookies

These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

We do not use this type of cookies on our website.

Definitions of the categories above are from the International Chamber of Commerce 'ICC UK Cookie Guide' 2<sup>nd</sup> edition November 2012.

## Marketing

We have no intention of processing personal information for marketing purposes or sharing personal information with third-parties for marketing purposes.

## **Changes to our Privacy Policy**

We keep our Privacy Policy under regular review. This Privacy Policy was last updated in April 2018.

#### Contact

If you would like to know more about this Privacy Policy, please contact the Data Protection Officer at <a href="mailto:office@healthcare4kids.co.uk">office@healthcare4kids.co.uk</a> or write to:

Data Protection Officer Healthcare4kids 9 Bridge Street Barford Warwick CV35 8EH

Our ICO registration number is ZZ231682