

Privacy Notice for Castle Dental Care for Patient Data

This Privacy Notice is a shortened form of our Privacy Policy and any patient who wishes to have a copy of our full Policy should ask at reception.

Castle Dental Care takes great care to protect the personal data we hold for you in line with the requirements of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

The purpose of collecting and storing personal data about you is to ensure we can:

- Provide, appropriate, safe and effective dental care, treatment and advice for you.
- Fulfil any contracts we hold in relation to your care.
- For business administration of your care.

Personal data held for our patients

The personal data we process (processing includes obtaining the information, using it, storing it, securing it, disclosing it, and destroying it) for you includes:

- Name, address, date of birth.
- Unique patient code.
- Next of kin.
- Email address.
- Phone numbers.
- GP contact details.
- NHS Number, NI Number.
- Occupation.
- Medical history.
- Dental care records including x-rays.
- Photographs.
- Family group.
- Financial information (including details of exemptions from dental charges)
- Credit cards receipts.
- Correspondence.
- Details of any complaints received.

We keep an inventory of personal data we hold on our patients and this is available on request.

At **Castle Dental Care** sensitive personal information relating to our patients is only used to provide dental care for the individual. It is never shared for research purposes or any non-clinical need.

1.1.3-Privacy-notice-patient-data-England-v3.0 2023 CDC – Introduced 25.06.2023 CJJ
Review Prior to 30.06.2024

(Replaced M 217T Privacy Notice, Ver 5 agilio iTeam & M 217TC Privacy Notice for Children, Ver 1 agilio iTeam)
(IG Folder, Displayed on Waiting Room Notice Board, On Practice Website)

The National Opt-out Policy introduced in March 2020 is therefore not operated at our practice on this basis.

Should we change our policy to use information for a non-clinical purpose or a research project, we would then introduce the National Opt-out policy and obtain additional consent.

Disclosure to third parties

The information we collect, and store will not be disclosed to anyone who does not need to see it.

We will share your personal information with third parties when required by law or to enable us to deliver a service to you or where we have another legitimate reason for doing so. Third parties we may share your personal information with may include:

- Regulatory authorities such as the General Dental Council or the Care Quality Commission.
- NHS Local Authorities.
- Finance company if applying for finance.
- Insurance companies.
- Loss assessors.
- Fraud prevention agencies.
- In the event of a possible sale of the practice at some time in the future.

We may also share personal information where we consider it to be in a patient's best interest or if we have reason to believe an individual may be at risk of harm or abuse.

Personal privacy rights

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, you have the following personal privacy rights in relation to the information we hold about you:

- Access to and copies of your records.
- Have inaccuracies deleted.
- Have information about you erased. This should be seen in light of the need to keep records about your dental care in case you have any problems in the future.
- Object to direct marketing.
- Restrict the processing of your information, including automated decision-making.
- Take your data to another dental practice or anywhere else.

Patients who wish to have inaccuracies deleted or to have information erased must speak to the dentist who provided or provides their care.

1.1.3-Privacy-notice-patient-data-England-v3.0 2023 CDC – Introduced 25.06.2023 CJJ
Review Prior to 30.06.2024

(Replaced M 217T Privacy Notice, Ver 5 agilio iTeam & M 217TC Privacy Notice for Children, Ver 1 agilio iTeam)
(IG Folder, Displayed on Waiting Room Notice Board, On Practice Website)

Legal basis for processing data held about patients.

The GDPR requires us to state the legal basis upon which we process all personal data for our patients and it requires us to inform you of the legal basis on which we process your personal data.

The legal basis on which we process personal information for our patients is:

- Contract - For the legitimate purposes of running a dental practice to deliver a service.
- Legal Obligation - Processing is necessary for the purpose of complying with our legal obligations.
- Legitimate Interests – To enable us to run a service to our patient's.
- Consent – To gain consent so we can offer services tailored to an individual's requirements.
- Vital Interest – To protect the welfare of someone's dental health.
- Public Task – The process is necessary for us to help safeguard our patients.

Automated decision making

We do not foresee any circumstances in which patient's personal data would be subjected to automated decision making with exception to the items listed below. If this position changes, we would provide notice of this on our website and notice board giving the right to object.

You will be asked to opt in to any processes involving automated decision making.

Automated decision making at Castle Dental Care includes:

- Text message reminders for appointments and recalls
- Email reminders for appointments and recalls
- Text or email messages to fill in various forms on portal

Consent

Castle Dental care will always obtain specific, opt in consent from you for direct marketing information.

We will also obtain specific, opt in consent from you for product & Service Information or Promotion.

If you are a new patient, we will obtain consent when you first attend the practice. If you are an existing patient, we will obtain consent when you attend for your recall appointment or for a treatment appointment.

1.1.3-Privacy-notice-patient-data-England-v3.0 2023 CDC – Introduced 25.06.2023 CJJ
Review Prior to 30.06.2024

(Replaced M 217T Privacy Notice, Ver 5 agilio iTeam & M 217TC Privacy Notice for Children, Ver 1 agilio iTeam)
(IG Folder, Displayed on Waiting Room Notice Board, On Practice Website)

We will refresh this consent annually when you complete a new medical history proforma or verbally on completion of treatment using our 'Preferences to Contact Patient' tag within our dental software or via the patient portal when we send you your forms to complete prior to your visit.

Withdrawal of consent

After you have given your opt in consent you have a right to withdraw your consent at any time.

Retention period

This practice retains dental records and orthodontic study models while you are a patient of our practice and after you cease to be a patient for **at least eleven years or for children until age 25, whichever is the longer.**

Complaints

You have a right to complain about how we process your personal data. All complaints concerning personal data should be made in person or in writing to Complaints Manager Colette Jinks. All complaints will be dealt with in line with the practice complaints policy and procedures.

Transferring personal data outside the EU

Any necessary information transferred outside the EU will be labelled with your unique identifying code rather than your name. A record of the unique identifying code will be held at the practice.

This Privacy Notice was reviewed and implemented on 25.06.2023.

It will be reviewed annually and is due for review on 30.06.2024 or prior to this date in accordance with new guidance or legislative changes.

**Document Change Record
for
General Data Protection Regulation (GDPR) and Data Protection Act 2018
Privacy Notice for Patient Data**

The table below is used to register all changes to the policy:

Published Date	Document Version Number	Pages affected	Description of revision	Author
01.02.2021	V3.0	Page 1	Notes on obtaining evidence of opt-in consent.	PL
01.02.2021	V3.0	Page 3	Information on when the National Opt-out Policy would apply in dental practice	PL
25.06.2023	V3.0	Whole Document	Replaced our M 217T Privacy Notice, Ver 5 (agilio iTeam & M 217TC Privacy Notice for Children Ver 1 (agilio iTeam for Basil Apolline 'Privacy Notice for Castle Dental Care for Patient Data'	CJJ

1.1.3-Privacy-notice-patient-data-England-v3.0 2023 CDC – Introduced 25.06.2023 CJJ
Review Prior to 30.06.2024

(Replaced M 217T Privacy Notice, Ver 5 agilio iTeam & M 217TC Privacy Notice for Children, Ver 1 agilio iTeam)
(IG Folder, Displayed on Waiting Room Notice Board, On Practice Website)