

Privacy Policy

DATA PROTECTION AND DISCLOSURE OF INFORMATION

1. Policy Statement

- 1.1. This Privacy Policy (**Policy**) applies to AMG Osteo Clinic Limited (**AMG Osteo**), company number 09172112. Any reference to 'us', 'our', 'we' in this Policy is a reference to AMG Osteo. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this Policy is a reference to any of our patients and potential patients.
- 1.2. As part of our services, we need to collect personal data from our patients and potential patients. AMG Osteo is the data controller for the processing of your personal data.
- 1.3. Your privacy is important to us and it is our Policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal data and details your rights in respect of our processing of your personal data.
- 1.4. We may also be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations, however we are committed to processing all personal information in accordance with the General Data Protection Regulation (**GDPR**), UK data protection laws and any other relevant data protection laws and codes of conduct (herein collectively referred to as "the data protection laws").
- 1.5. AMG Osteo has developed policies, procedures, controls and measures to ensure maximum and continued compliance with the data protection laws and principles. Ensuring and maintaining the security and confidentiality of personal and/or special category data is one of our top priorities and we are proud to operate a 'Privacy by Design' approach, assessing changes and their impact from the start and designing systems and processes to protect personal information at the core of our business.
- 1.6. AMG Osteo is registered with The Information Commissioners Office (**ICO**) which is an independent regulatory office who reports directly to Parliament and whose role it is to uphold information rights in the public interest. ICO Registration number ZA365116.
- 1.7. AMG Osteo appears on the Data Protection Register as a controller of personal information and the Data Protection Officer (**DPO**) is Alice Monger-Godfrey.

2. Purpose

- 2.1. The purpose of this Policy is to ensure that AMG Osteo meets its legal, statutory and regulatory requirements under the data protection laws and to ensure that all personal and special category information is processed compliantly and, in the individuals, best interest.
- 2.2. The data protection laws include provisions that promote accountability and governance and as such AMG Osteo has put comprehensive and effective governance measures into place to meet these provisions. The aim of such measures is to ultimately minimise the risk of breaches and uphold the protection of personal data.

3. What kind of personal data do we collect?

- 3.1. Information protected under the GDPR is known as "personal data" and is defined as:

"Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."
- 3.2. In relation to the 'Special categories of personal data' the GDPR advises that:

"Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited – unless one of the Article 9 clauses applies."
- 3.3. AMG Osteo ensures that a high level of care is afforded to personal data falling within the GDPR's 'special categories' (previously sensitive personal data), due to the assumption that this type of information could be used in a negative or discriminatory way and is of a sensitive, personal nature to the persons it relates to.

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3.4. AMG Osteo collects information necessary to fulfil our obligations to our patients in the course of providing our services.

3.5. We may collect the following types of information about you:

- Name, address and contact details, date of birth and gender, employment details, your physical hobbies and your doctor's name and address and other similar information.

3.6. We may also collect the following sensitive personal data about you only where required for the provision of our services to you:

- physical or mental health details.

We shall only obtain and process this information with your express consent.

3.7. Much of this information is collected in order to provide you with the services that you require. If you chose not to provide the information required, we may not be able to provide you with the requested services.

3.8. If you provide us with any personal data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained their consent.

4. How is the personal data obtained?

4.1. We obtain this information through your completion of our Consent Form and from information you provide in the course of our ongoing services to you.

4.2. We may record any communications with you including electronic, by telephone, in person or otherwise, which will constitute evidence of the communications between us. This information is collected in compliance with our professional duties under the General Osteopathic Council.

4.3. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

5. Privacy by Design

5.1. We operate a 'privacy by design' ethos by the following measures:

- Data minimisation.** Our systems, employees, processes and activities are designed to limit the collection of personal information to that which is directly relevant and necessary to accomplish the specified purpose. Data minimisation enables us to reduce data protection risks and breaches and supports our compliance with the data protection laws.
- Encryption.** We utilise encryption as a further risk prevention measure for securing the personal data that we hold.
- Restriction.** Restricting access is built into the foundation of our processes, systems and structure and ensures that only those with authorisation and/or a relevant purpose, have access to personal information and only those with authorisation can access Special category data.
- Hard Copy Data.** Due to the nature of our business, it is sometimes essential for us to obtain, process and share personal and special category information which is only available in a paper format. This is always done with data protection in mind & due care and consideration.

6. What Lawful Basis do we rely on?

6.1. The data protection laws allow us to only process your data for certain reasons:

- to perform a contract that we are party to (for example, provide our services to you, as agreed between you and us);
- to carry out legally required duties, including those under the General Osteopathic Council;
- for us to carry out our legitimate interests;
- where we obtain your consent;
- to protect your interests; and
- where something is done in the public interest.

6.2. All the processing carried out by us falls into the first four permitted reasons, for example; our use of your personal data in order to comply with our obligations under contract.

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7. Consent

- 7.1. Where our use of your personal data requires consent, such consent will be provided explicitly by you.
- 7.2. If we rely on your consent as our legal basis for processing your personal data, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this Privacy Notice.

8. What we do with the personal data we obtain?

- 8.1. We may use information held about you to provide you with any services and/or information you request from us (which includes carrying out any obligations arising from any contracts entered into between you and us).

Please note: we do not use your personal data to engage in any marketing activities.

9. Disclosure of your personal data

- 9.1. We shall never sell, trade, rent or share your personal data, unless required from time to time to share your personal data with any governmental or judicial bodies or agencies to comply with our legal and regulatory obligations.

10. How we store personal data

- 10.1. Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium.

We hold personal data in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure. AMG Osteo utilises external processors for certain processing activities (where applicable), for example IT systems and services.

- 10.2. When we consider that personal data is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time in line with our professional obligations under the General Osteopathic Council. For example, we are subject to the Code of Conduct of the General Osteopathic Council that requires us to retain our records for a period of 8 years after our relationship with you has ended.
- 10.3. If we hold any personal data in the form of a recorded communication, by telephone, electronic, in person or otherwise in relation to our professional obligations as detailed above, this information will be held for a period of 8 years after our relationship with you has ended.

11. Management and Safeguarding of personal data

- 11.1. We always take appropriate technical and organisational measures to ensure that your information is secure. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.
- 11.2. The internet is an open medium and we cannot guarantee that any information you send to us by email will not be intercepted or tampered with; any transmission is at your own risk. To help protect your personal data and minimise the risk of it being intercepted by unauthorised third parties our secure servers employ 2048-bit SSL certificate encryption when you submit information to us. This security is signified by the "https" and the padlock on the URL bar. Some older browsers do not allow the use of current SSL technology and we therefore recommend that you use an up to date browser. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

12. Your rights as a data subject

- 12.1. The data protection laws give you certain rights in relation to the data we hold on you. These are:
- **the right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this Policy
 - **the right of access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request
 - **the right for any inaccuracies to be corrected.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it

- **the right to have information deleted.** If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- **the right to restrict the processing** of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- **the right to portability.** You may transfer the data that we hold on you for your own purposes
- **the right to object to the inclusion of any information.** You have the right to object to the way we use your data where we are using it for our legitimate interests
- **the right to regulate any automated decision-making and profiling** of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

12.2. Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to store and use the data where so permitted by having a legitimate reason for doing so or where required by law, regulation or by any other competent authorities.

12.3. You can read more about these rights here; <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

13. Transfers of personal data outside the EEA

13.1. Your data may be transferred to, stored at, and processed at a destination outside the European Economic Area by our service providers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with the GDPR or other relevant laws.

14. Cookies

14.1. This website uses cookies which are stored on your browser. You can usually modify your browser settings to prevent this happening. However, by disabling cookies, or certain types of cookie, you may hinder your user experience on this and other websites, or prevent them from working entirely.

14.2. Some cookies used on this website are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, services you have asked for cannot be provided. Some cookies used on this website 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.

14.3. 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 our website works.

14.4. 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 is anonymised and they cannot track your browsing activity on other websites.

15. Links to external websites

15.1. Our sites may, from time to time, contain links to other websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or how such websites collect and use your data. Please check these policies before you submit any personal data to these websites.

16. Access to personal data about you

16.1. You have the right to request a copy of the personal data we hold about you. If you would like a copy of some or all of this information you may contact us at info@amg-osteo.com ; +44(0) 7850217167 or you may write to us at our registered office address: 63 Fairfax Avenue, Ewell, Epsom, Surrey, KT17 2QQ. If any of the information we hold is inaccurate, you can ask us to make any necessary amendments.

17. Updates to the Privacy Notice

17.1. We reserve the right to update this Policy to reflect any legal changes or changes to the way in which we process your personal data. The updated Policy will be published on our website and comes into effect at the time of publication on the website.

18. Contact Us

18.1. If you have any queries regarding privacy issues or the content of this Policy, you can email us on info@amg-oste.com , write to us at: 63 Fairfax Avenue, Ewell, Epsom, Surrey, KT17 2QQ or call us on +44(0) 7850217167.

19. What if you have a complaint?

19.1. If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us via one of the methods set above. If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our supervisory authority, the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

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