

Privacy Policy for The Dental Studio for Patient Data

The Dental Studio takes great care to protect the personal data we hold for our patients in line with the requirements of the Data Protection Act 2018 which is the UK's implementation of the General Data Protection Regulation (UK GDPR).

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

- Provide, appropriate, safe and effective dental care, treatment and advice for all our patients.
- Fulfil any contracts we hold in relation to their care.
- For business administration of their 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 our patients includes:

- Name, address, date of birth.
- Unique identification number.
- Next of kin.
- Email address.
- Phone numbers.
- GP contact details.
- Occupation.
- Medical history including COVID screening questions.
- Dental care records.
- Photographs.
- Family group.
- Payment plan details.
- Financial information.
- 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 for patients on request. A list of personal information held is also included in our Privacy Notice that is given to all patients.

National Opt-out Policy

At The Dental Studio 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. 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.

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 our patients' personal information with third parties when required by law or to enable us to deliver a service to them or where we have another legitimate reason for doing so. Third parties we may share patients' personal information with may include:

- Regulatory authorities such as the General Dental Council or the Care Quality Commission
- NHS Local Authorities
- Dental payment plan administrators
- 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 UK GDPR and the Data Protection Act 2018, all individuals who have personal information held about them have the following personal privacy rights:

- Right to subject access.
- Right to have inaccuracies deleted.
- Right to have information erased.
- Right to object to direct marketing.
- Right to restrict the processing of their information, including automated decision-making.
- Right to data portability.

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

Legal basis for processing data held about patients

The UK GDPR requires us to state the legal basis upon which we process all personal data for our patients and it requires us to inform our patients of the legal basis on which we process their personal data. This is clearly stated in our privacy notice that is given to all patients.

The legal bases for recording individual types of data are recorded in our patient personal data inventory. This is available for all patients to see on request.

The legal basis on which we process personal information for our private patients the legitimate interest in providing healthcare services and ensuring the effective management and administration of those services, in compliance with applicable data protection laws and regulations.

The legal basis on which we process personal information for our payment plan patients is the performance of a contract, as it is necessary to manage and administer the payment plans and to fulfil our contractual obligations to our patients.

The legal basis on which we process personal information for our NHS patients is the necessity for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller, in accordance with the requirements of the National Health Service (NHS) and applicable data protection laws and regulations.

Automated decision making

All individuals who have personal data held about them have a right to object to their personal data being subjected to automated decision making.

Patients will always be asked to give specific, informed, verifiable, opt in consent for any processes involving automated decision making.

Consent

The Dental Studio may need to contact our patients, their families or third-party organisations regarding patients' appointments, medical histories, and treatment. Where possible, we will obtain prior consent to process and share this information.

Where patients have not previously consented to or have withdrawn their consent for us to contact or share or process their data, we will assess whether the need for processing is proportionate and necessary in relation to the risk to the individual and/or the public if the information is not shared.

The Dental Studio always obtains specific and unambiguous opt-in consent from all patients before sending them direct marketing information. Patients are asked to fill in the Contact Consent form on their patient portal if they wish to receive direct marketing. If they do not wish to receive such information, they simply do not sign the document.

For a new patient, we obtain consent for these things when the patient first attends the practice. For an existing patient, we ask the patient for consent when they attend for their recall appointment or for a treatment appointment. We refresh this consent annually when the patient completes a new medical history proforma.

Withdrawal of consent

Patients who have given their opt in consent have a right to withdraw their consent at any time. Patients are advised of their right to withdraw their consent for anything they wish to withdraw from in our privacy notice.

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 longer.

Complaints

All individuals who have personal data held about them have a right to complain. All complaints concerning personal data should be made in person or in writing to Mrs Jeanine Green. All complaints will be dealt with in line with the practice complaints policy and procedures.

If you are unhappy with the resolution of your complaint, you have the right to raise your complaint with the Information Commissioner's Office (ICO).

The ICO can be contacted at <https://ico.org.uk/make-a-complaint> or you can start a [live chat](#) or call the ICO helpline on 0303 123 1113.

Further information on making a complaint to the ICO can be found here: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints>

Transferring personal data outside the EU

This practice sends any necessary laboratory work to The United States.

Laboratory work sent outside the EU will be labelled with the patient's unique identifying number rather than the patient's name. A record of the unique identifying number will be held at the practice.

This Policy was reviewed and implemented on: 03/06/2024

This policy and relevant procedures will be reviewed annually and are due for review on 03/06/2025 or prior to this date in accordance with new guidance or legislative changes.

Document Change Record for Privacy Policy 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
22.07.2020	V2.2	Page 1	Purpose for collecting data updated to reflect COVID-19 pandemic	LH
22.07.2020	V2.2	Page 5	Obtaining consent during the COVID-19 pandemic	LH
01.02.2021	V3.1	Page 1	Notes on obtaining evidence of opt-in consent.	PL
01.02.2021	V3.1	Page 3	Information on when the National Opt-out Policy would apply in dental practice	PL
24/01/2023	V3.2	All	Removal of pandemic references, update reflecting changes to GDPR within the UK	PP
14.08.2023	V3.3	Various	Updated the complaints section with contact details for the ICO. Updated retention period for patient records. Amalgamation of English & Welsh policy and renamed.	PL/IL