

# PRIVACY NOTICE (TIER 4)

**Document Control**  
Reference: GDPR REC 4.1  
Issue No: 1  
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## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

## 2. Responsibilities

- 2.1 The [Data Protection Officer (DPO)] / [GDPR Owner] is responsible for ensuring that this notice is made available to data subjects prior to Graham Holman Physiotherapy Ltd (Havering Therapy Centre) collecting/processing their personal data.
- 2.2 All [Employees/Staff] of Graham Holman Physiotherapy Ltd (Havering Therapy Centre) who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

**Graham Holman Physiotherapy Ltd trading as Havering Therapy Centre is a business predominantly providing Physiotherapy and Podiatry services to the public. We also rent rooms to therapists who provide other healthcare services such as counselling, acupuncture, reflexology, sports massage.**

Our [Data Protection Officer (DPO)] / [GDPR Owner] and data protection representatives can be contacted directly here:

- physio@grahamholman.com
- 07789686673

The personal data we would like to collect from you is:

<b>Personal data type:</b>	<b>Source</b> (where Graham Holman Physiotherapy Ltd/Havering Therapy Centre obtained the personal data from if it has not been collected directly from you, the data subject. Note if the personal data has been accessed from publicly accessible sources):
Full name, Date of Birth, Address, Contact phone number	Direct from the patient or referring source, e.g. General Practitioner/Consultant or from a third party insurance/intermediary.

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General Practitioner's details (name, address and contact number)	Direct from the patient or referring source, e.g. General Practitioner/Consultant or from a third party insurance/intermediary.
Medical details about you (diagnosed conditions or conditions under investigation, medications taken)	Direct from the patient or referring source, e.g. General Practitioner/Consultant or from a third party insurance/intermediary.
Employment details (job type/title and duties undertaken) Social activities, sporting interests and hobbies.	Direct from the patient or referring source, e.g. General Practitioner/Consultant or from a third party insurance/intermediary.

The personal data we collect will be used for the following purposes:

- Managing your (the patient) appointment/s from an administrative perspective.
- As part of the Physiotherapy/Podiatry Assessment and treatment process
- To write reports (where required) for third parties such as your G.P. or Insurance company/intermediary.

Our legal basis for processing for the personal data:

- Consent (verbal and written)

Any legitimate interests pursued by us, or third parties we use, are as follows:

- Social media (Facebook and Instagram) marketing, where the patient may like or follow the clinic's account/page.

The special categories of personal data concerned are:

- Health data

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Graham Holman Physiotherapy Ltd (Havering Therapy Centre) to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by informing your treating practitioner or a member of reception staff in person, or by writing to the DPO (Graham Holman).

### 3.3 Disclosure

Graham Holman Physiotherapy Ltd (Havering Therapy Centre) will not pass on your personal data to third parties without first obtaining your consent and discussing with you the full purpose of disclosing this data, for example to write to your G.P. or to write a medical report on your behalf to the referring source. This data is sent by letter or secure email a copy of the letter/report is kept with your medical records.

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Comments to [ssmith@itgovernancepublishing.co.uk](mailto:ssmith@itgovernancepublishing.co.uk)

### 3.4 Retention period

Graham Holman Physiotherapy Ltd (Havering Therapy Centre) will process personal data for the duration that you are under active treatment with us (until you are discharged) and will store the personal data for 8 years after your last treatment date (for an adult) and until the patient's 25<sup>th</sup> birthday if under 18 at the time of treatment, or 26<sup>th</sup> birthday if 17 years old at the time of the last treatment.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Organisation Name refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Graham Holman Physiotherapy Ltd (Havering Therapy Centre), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Graham Holman Physiotherapy Ltd (Havering Therapy Centre)'s data protection representative Graham Holman.

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The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
Contact Name:	Graham Holman	Graham Holman
Address line 1:	6 Brierley Close	6 Brierley Close
Address line 2:	Hornchurch	Hornchurch
Address line 3:	RM11 2BD	RM11 2BD
Address line 4:		
Address line 5:		
Email:	physio@grahamholman.com	physio@grahamholman.com
Telephone:	07789686673	07789686673

### 3.7 Privacy statement

Read more about how and why we use your data here [www.haveringtherapy.co.uk](http://www.haveringtherapy.co.uk)

## 4. Online privacy statement

### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); 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".

### How we use your information

This privacy notice tells you how we, Graham Holman Physiotherapy Ltd (Havering Therapy Centre), will collect and use your personal data for managing your appointments at the clinic, forming part of our assessment and clinical decisions and potentially reporting back to your G.P. or referring source.

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Why does Graham Holman Physiotherapy Ltd (Havering Therapy Centre) need to collect and store personal data?

In order for us to provide you Physiotherapy/Podiatry treatment we need to collect personal data for managing your appointments with us, forming part of our assessment of you and potentially providing reports to another medical professional or referring source. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Graham Holman Physiotherapy Ltd (Havering Therapy Centre) would contact you for additional consent.

Will Graham Holman Physiotherapy Ltd (Havering Therapy Centre) share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Graham Holman Physiotherapy Ltd (Havering Therapy Centre) in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to form their part of your treatment/management. When they no longer need your data to fulfil this service, they will dispose of the details in line with Graham Holman Physiotherapy Ltd (Havering Therapy Centre)'s procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will Graham Holman Physiotherapy Ltd (Havering Therapy Centre) use the personal data it collects about me?

Graham Holman Physiotherapy Ltd (Havering Therapy Centre) will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Graham Holman Physiotherapy Ltd (Havering Therapy Centre) is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will Graham Holman Physiotherapy Ltd (Havering Therapy Centre) contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

## Can I find out the personal data that the organisation holds about me?

Graham Holman Physiotherapy Ltd (Havering Therapy Centre) at your request, can confirm what information we hold about you and how it is processed. If Graham Holman Physiotherapy Ltd (Havering Therapy Centre) does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of [Organisation Name] or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## What forms of ID will I need to provide in order to access this?

Graham Holman Physiotherapy Ltd (Havering Therapy Centre) accepts the following forms of ID when information on your personal data is requested:

Two of the following; passport, driving licence, birth certificate, utility bill (from last 3 months)

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Contact details of the [Data Protection Officer (DPO)] / [GDPR Owner]:

	<b>[Data Protection Officer (DPO)] / [GDPR Owner] contact details</b>
Contact Name:	Graham Holman
Address line 1:	6 Brierley Close
Address line 2:	Hornchurch
Address line 3:	RM11 2BD
Address line 4:	
Address line 5:	
Email:	physio@grahamholman.com
Telephone:	07789686673

### **Document Owner and Approval**

The [Data Protection Officer (DPO)] / [GDPR Owner] is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff in the policies folder and on the company website ([www.haveringtherapy.co.uk](http://www.haveringtherapy.co.uk))

Signature:

Date:

### **Change History Record**

Issue	Description of Change	Approval	Date of Issue

Graham Holman  
Physiotherapy Ltd  
(Havering Therapy  
Centre)