PRIVACY POLICY

PureChiro Clinic is committed to protecting the privacy of our patients and those that we have contact with. We believe in being open and up front with how we use personal data that is entrusted to us, and we are committed to making **Privacy a Priority**. If you would like to know more about how we process your personal data, please read our detailed **Privacy Policy** below.

PureChiro Clinic makes Privacy a Priority:

We will collect, process, store and share your data safely and securely, by ensuring:

- **You're always in control:** Your privacy will be respected at all times, and we will put you in control of your privacy with easy-to-use tools and clear choices.
- **We work transparently:** We will be transparent about the data we collect and how we use that data so that you can make fully informed choices and decisions.
- **We operate securely:** We will protect the data that you entrust to us via appropriate security measures and controls. We'll also ensure that other businesses we work with are just as careful with your data.
- **For your benefit:** When we do process your data, we will use it to benefit you, to make your experience better and to improve our products and services.

1. WHO WE ARE

"PureChiro Clinic" (referred to in this policy as "we", "us or "our") is a trading name of:

PureChiro Clinic Limited
3 Stubley Drive,
Dronfield
S18 8QY

Registered Company Number: 09733250

We have a Data Protection Lead (DPL), who can be contacted in the following ways should you have any questions or feedback about the way your data is handled:

Email: luke@purechiroclinic.com

Mail: Data Protection Lead
PureChiro Clinic
3 Stubley Drive,
Dronfield,
S18 8QY

2. HOW WE COLLECT YOUR PERSONAL DATA

We will collect your personal data in the following ways:

- When you request or use the services we provide;
- When you talk with us either via email, SMS, WhatsApp, post or over the phone;
- When you visit our website;
- When you make an appointment;
- When you fill out our forms;

- When you apply to work for us;
- When you contact us via social media;
- When you subscribe to our newsletters or marketing;
- When you attend an appointment;
- When you visit our site, and your personal data is captured on our CCTV; and
- From third parties or publicly available sources (for example, job boards).

Failing to provide necessary personal data may mean that we are unable to fulfil your requirements.

3. PERSONAL DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the table below.

Category of personal data	Description
Identity data	First name, Surname, DOB, Signature, Gender, Title, Image data, Age, Preferred name
Contact data	Home telephone number, Mobile phone number, Email address, Postal Addresses
Account data	Password, Account type, Username
Payment data	Account number, Sort code, Bank branch, Invoice total, Payment type, Billing history
Medical data	Medical history, Disability details, Mental health details, GP address, Medication, Any surgery, Any ailments, Type of health insurance
Treatment data	Treatment, Pain scale rating, How the discomfort is affecting the life of the individual, Patients aims for treatment, Feedback
Appointment data	Reason for visit and how the issues began, Areas of discomforts on body, Description of discomforts, Appointment time and duration, which employee has been assigned to the patient, Appointment type, Referral source, Repeat appointments, Status of appointment.
Family data	Emergency point of contact name and phone number, information about children and their ages, Family medical history
Message data	Any data that is contained within a message body or a subject from an individual that the recipient was not expecting to be disclosed.
Technical data	IP address, Browser type, The URL which the user originated from, Cookies, Web beacons
Observation data	Blood Pressure, Height, Weight, Posture photos, Posture details, Xray's, Measurements, Deviations

Lifestyle data	Whether they smoke or have ever smoked, Whether the patient drinks, Amount of exercise, Rating scale for Diet, Sleep, Exercise Habits, Energy Levels and Posture, details regarding sex life (if provided)
Job data	Propositioned job title, Job description, Contracted hours, Start date, Schedule
Education data	Qualifications achieved; School/College/University attended
Employment data	Employment history, Skills acquired

4. HOW WE USE YOUR PERSONAL DATA

We are only allowed to use your personal data if we have a legal basis to do so, and we are required to inform you of what that legal basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the legal ground on which we rely on when we process the personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on our legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal data	Legal basis for processing	Legitimate Interests (if applicable)
To process and deliver our services to you which you have requested.	• Identity • Contact • Treatment • Medical • Payment • Appointment • Lifestyle • Observations	Performance of a Contract	N/A
To manage and administer appointments	• Identity • Contact • Appointments • Payment	Performance of a Contract	N/A
To photograph a patient's posture	• Identity • Observation • Treatment	Performance of a Contract	N/A
To provide you with resources as part of your treatment.	• Identity • Contact • Account • Technical • Treatment • Message	Performance of a Contract	N/A

To process your job application with us.	• Identity • Contact • Job • Employment • Education	Performance of a Contract	N/A
To efficiently document with best practice in mind.	• Identity • Contact • Treatment • Medical • Payment • Appointment • Lifestyle • Observations	Performance of a Contract	To maximise efficiency of healthcare professionals capabilities.
To administer CCTV in our Reception Area.	• Identity	Legitimate Interests	For the prevention and detection of crime.
To contact our patients regarding their appointments or treatments.	• Identity • Contact • Message • Appointment • Medical	Legitimate Interests	To ensure efficient communication with patients regarding their appointments or treatments.
To manage incoming general enquiries or complaints.	• Identity • Contact • Message	Legitimate Interests	To ensure that enquiries and complaints are managed efficiently and in line with the PureChiro Clinic Complaints Procedure.
To track patients objectives for progress checks with ongoing treatments	• Identity • Medical • Treatment • Observation	Legitimate Interests	To tract progress with patients and document milestones with ongoing treatments
To talk with you through our social media pages	• Identity • Message	Legitimate Interests	To be able to respond to patients or members of the public's comments on our social media pages.
To administer articles or newsletters to individuals.	• Identity • Contact	Consent	N/A

5. SPECIAL CATEGORY PERSONAL DATA

Special category personal data is personal data that is more sensitive by nature such as medical and treatment data. At PureChiro Clinic, there will be circumstances where a

patient needs to inform us of personal data relating to their health so we can provide treatment accordingly.

When we process personal data concerning your health details and details concerning your sex life, our special category condition for processing this information is for **Preventative and Occupational Medicine**, Article 9 (2)(h) of the UK General Data Protection Regulation.

6. WHO WE SHARE YOUR PERSONAL DATA WITH

In order to provide you with our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- To fulfil the services that you have requested us to perform;
- To process debit/credit card payments and any other transactions authorised by the patient;
- To administer and monitor our CCTV system;
- To securely process your patient records and information;
- To administer and manage your appointments;
- To administer marketing on behalf of PureChiro Clinic;
- To provide you with rehabilitation resources as part of your treatment; and
- To meet legal obligations, for example, for the purposes of national security, taxation and criminal investigations.

We'll never make your personal data available to anyone outside PureChiro Clinic for them to use for their own marketing purposes without your prior consent.

7. THIRD PARTY LINKS

Our website includes links to third-party websites and plug-ins. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

8. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE EEA

The European Economic Area (EEA) consists of the EU Member States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we will rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.

- **Standard Contractual Clauses:** The recipient of your personal data has provided us with signed Standard Contractual Clauses which has been approved by the European Commission. This holds the recipient accountable to safeguard the personal data.

Circumstances where your personal data may be transferred outside of the EEA are as follows:

Purpose of processing	Categories of personal data	Third party	Location	Safeguards for transfer

For the administration of Marketing.	• Identity • Contact	MailChimp	United States	SCC's
For the administration of the practice management platform that manages patient records, appointments and schedules.	• Identity • Contact • Treatment • Medical • Payment • Appointment • Lifestyle • Observations	Cliniko PracticeHub	Australia Gibraltar	SCC's
To organise in-house talks or workshops	• Identity • Contact • Payment	Eventbrite	United States	SCC's
To securely store posture photos.	• Identity • Observation	Apple (iCloud)	United States	SCC's
To provide you with an exercise platform as part of your treatment plan	• Identity • Contact • Account • Technical • Treatment	Track Active Pro	Australia	SCC's
To efficiently process documentation.	• Identity • Contact • Treatment • Medical • Payment • Appointment • Lifestyle • Observations	Heidi	Australia	SCC's
To perform administrative tasks as well as to communicate with you.	• Identity • Contact • Treatment • Medical • Payment • Appointment • Lifestyle • Observations	Google	United States	SCC's
To track patients objectives for progress checks with ongoing treatments	• Identity • Medical • Treatment • Observation	Chiropractic Outcomes	Estonia	SCC's

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Sharing Agreement in place to protect that sharing of data.

9. HOW LONG WE RETAIN YOUR PERSONAL DATA

We will keep your personal data for as long as necessary to allow us to carry out our business functions. This includes satisfying any legal, accounting, or reporting requirements. When we assess how long to retain your personal data, we will consider the following:

- Any statutory or legal obligations;
- The purposes for which we originally collected the personal data;
- The lawful grounds on which we based our processing;
- The types of personal data we have collected;
- The amount and categories of your personal data; and
- Whether the purpose of the processing could reasonably be fulfilled by other means.

For patients' personal data, the personal data will be retained and kept securely for up to 8 years following conclusion of treatment, until the patient reaches the age of 25 if this is longer or if you pass away. After which time, the personal data will be archived, deleted or anonymised.

For unsuccessful job applicants, we will retain your personal data for 12 months following refusal of employment.

At PureChiro Clinic, we regularly review the retention of your personal data held within our care to ensure that we are not keeping your personal data for longer than is necessary.

10. HOW WE LOOK AFTER YOUR PERSONAL DATA

We will protect your personal data that you have provided to us via appropriate security measures and controls. This includes implementing technical and organisational measures to prevent the loss, misuse or alteration of your personal data. PureChiro Clinic limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instruction, and they are subject to a duty of confidentiality.

11. YOUR RIGHTS

Everyone in the scope of the UK GDPR has rights relating to the collection and use of their personal data. The rights that apply to your personal data that is held within PureChiro Clinic are listed below:

Right to be Informed: We will always be transparent in the way we use your personal data. You will be informed about the processing through relevant privacy policies.

Right to Access: You have a right to request access to the personal data that we hold about you and this should be provided to you.

Right to Rectification: We want to make sure that the personal data we hold about you is accurate and up to date. If any of your details are incorrect, please let us know and we will amend them.

Right to Erasure: You have the right to have your data 'erased' in the following situations:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed;
- When you withdraw consent;

- When you object to the processing and there is no overriding legitimate interest for continuing the processing;
- When the personal data was unlawfully processed; or
- When the personal data has to be erased in order to comply with a legal obligation.

Please note that each request will be reviewed on a case-by-case basis and where we have a lawful reason to retain the data or where exceptions exist within our retention policy, then it may not be erased.

Right to Restrict Processing: You have the right to restrict processing in the following situations:

- Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
- When processing is unlawful, and you oppose erasure and request restriction instead; or
- Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.

Right to Data Portability: In certain situations, you have the right to obtain and reuse your personal data for your own purposes via a machine-readable format, such as a .CSV file.

Right to Object: You have the right to object to the processing of your personal data in the following circumstances:

- You no longer want to receive direct marketing.
- Where processing is based on our legitimate interests

If you want to exercise any of your rights listed above, please contact us by using the details below.

12. NOT HAPPY?

If you feel that PureChiro Clinic have not upheld your rights, we ask that you contact us by emailing luke@purechiroclinic.com.

If you are not satisfied with our response, or believe that we are not processing your personal data in accordance with the law, you have the right to lodge a complaint with the Information Commissioners Office (ICO) by using the details below. We would be grateful for the opportunity to manage your concerns directly before you approach the ICO so please contact us in the first instance.

Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: https://ico.org.uk/make-a-complaint/