Data protection privacy notice for patients

In providing your dental care and treatment, we will ask for information about you and your health. Occasionally, we may receive information from other providers who have been involved in providing your care.

This notification sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of data protection legislation, including the UK Data Protection Act 2018, the General Data Protection Regulation (GDPR), the UK Privacy and Electronic Communications Regulations 2003 (PECR), and other applicable legislation, Real Good Dental, is the controller and our contact details are: 25 Queen Street, Edinburgh, EH2 1JX.

Real Good Dental is the data controller for all personal data processed at its associated dental practices throughout the United Kingdom as well as our practices in Ireland.

Our Data Protection Officer is The Privacy Worx and they can be contacted at dpo@theprivacyworx.com

Information that we hold

We can only keep and use information for specific reasons set out in the law. If we want to keep and use information about your health, we can only do so in particular circumstances. Below, we describe the information we hold and why, and the lawful basis for collecting and using it.

Contact details

We hold personal information about you including your name, date of birth, address, telephone number and email address. This information allows us to fulfil our contract with you to provide appointments and offer treatment. We will also use the information to send you reminders and recall appointments as we have a legitimate interest to ensure your continuing care and to make you aware of our services and offers.

Dental records

We hold information about your dental and general health, including

- Clinical records made by dentists and other dental professionals involved with your care and treatment
- X-rays, clinical photographs, digital scans of your mouth and teeth, and study models
- Medical and dental histories
- Treatment plans and consent

- Notes of conversations with you about your care
- Dates of your appointments
- Details of any complaints you have made and how these complaints were dealt with
- Correspondence with you and other health professionals or institutions.

We collect and use this information to allow us to fulfil our contract with you to discuss your treatment options and provide dental care that meets your needs. We also use this information for the legitimate interest of ensuring the quality of the treatment we provide.

Financial information

We hold information about the fees we have charged, the amounts you have paid and some payment details. This information forms part of our contractual obligation to you to provide dental care and allows us to meet legal financial requirements.

How we use your information

To provide you with the dental care and treatment that you need, we require up-to-date and accurate information about you.

We may contact you to conduct patient surveys or to find out if you are happy with the treatment you received for quality control purposes. We may also from time to time email you with material in our legitimate interest regarding the practice or your treatment.

If you make a complaint about the care or service you received, we will use your personal data (including health information) to investigate and respond to your complaint. This may involve sharing details of the complaint and your records with the staff or dentists involved in your treatment, **solely** for the purpose of resolving the issue.

Patient information for research or educational purposes:

If we wish to use your information for dental research or dental education, we will discuss this with you and seek your consent. Depending on the purpose and if possible, we will anonymise your information. If this is not possible, we will inform you and discuss your options.

Sharing information

Your information is normally used only by those working at Real Good Dental, including our employed and self-employed clinicians. However, to provide you with safe, high-quality dental care, we may need to share your personal data with:

- Our Dentists are often self-employed dentists who provide treatment at our practices. These professionals provide care as part of our team and are authorised to process your data under our instruction. They are not separate data controllers. We will share personal data (including health data) with associate dentists for the purposes of providing you appropriate care and also for investigating and responding to any patient's complaint. When handling complaints we rely on Article 6(1)(f) (legitimate interests) – given its legitimate interest in effective complaint resolution – and/or Article 6(1)(c) (legal obligation) – acknowledging healthcare regulatory duties to handle complaints. Because the complaint involves dental treatment information (health data), Real Good Dental also invokes an Article 9 exception: primarily Article 9(2)(h)for health care management, with Article 9(2)(f) as a supportive ground in anticipation of any legal claims. Associate Dentists an authorised practitioner under Real Good Dental's control, means the data remains within Real Good Dental's sphere of responsibility at all times.

- Dental Laboratories, which manufacture custom dental devices and prosthetics based on a prescription from your clinician. They are independent data controllers and are required to comply with medical device regulations and data protection law.

- Your GP, community dental services, or other health professionals involved in your care.

- Specialist dental or medical services to whom we refer you.

- Private dental schemes (if you are a member)

- Debt collection agencies, where necessary

- Third-party providers such as our practice software, communication tools, and secure email platforms

We will only disclose your information on a need-to-know basis and will always limit it to the minimum necessary. You will be informed in advance if your information is to be shared for reasons outside those listed above.

We will only disclose your information on a need-to-know basis and will limit any information that we share to the minimum necessary. We will let you know in advance if we send your medical information to another medical provider and we will give you the details of that provider at that time.
We may use third party software providers to process your personal data such as our practice software, communication and email facilitators, in the normal course of business.

In certain circumstances or if required by law, we may need to disclose your information to a third party not connected with your health care, including HMRC or other law enforcement or government agencies.

We do not transfer your personal data outside of the UK.

We keep your records for 11 years after the date of your last visit to the Practice or until you reach the age of 25 years, whichever is the longer. At your request, we will delete non-essential information (for example some contact details if requested to do so) before the end of this period.

Access to your information and other rights

You have a right to access the information that we hold about you and to receive a copy. We do not usually charge you for copies of your information; if we pass on a charge, we will explain the reasons.

You can also request us to

- Correct any information that you believe is inaccurate or incomplete. If we have disclosed that information to a third party, we will let them know about the change.
- Erase some of the information we hold. For legal reasons, we may be unable to erase certain information (for example, information about your dental treatment). However, we can, if you ask us to, delete some contact details and other non-clinical information.
- Stop using your information – for example, sending you reminders for appointments or information about our service.

- Stop using information if you believe the information is inaccurate or you believe we are using your information illegally.
- Supply your information electronically to another dentist.

If we are relying on your consent to use your personal information for a particular purpose, you may withdraw your consent at any time and we will stop using your information for that purpose.

All requests should be made by email to our data Protection Officer - The Privacy Worx at dpo@theprivacyworx.com

You also have the right to complain about how we use your personal information to the Information Commissioner's Office (ICO). Details about this are on their website at **www.ico.org.uk** or Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (0303 123 1113 or 01625 545745).

If you do not agree

If you do not wish us to use your personal information as described, you should discuss the matter with your practice. If you object to the way that we collect and use your information, we may not be able to continue to provide your dental care.

Date: January 2024

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