

# **Privacy Policy**

#### **Privacy Policy**

Gary Sadler Physiotherapy promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect and process your data and not do anything you wouldn't reasonably expect. By signing up for care provision you are accepting and consenting to the practices described in this policy. Developing a better understanding of our service users through their personal data allows us to make better decisions. We have made improvements to this policy to make it more understandable to service users. For the purpose of the General Data Protection Regulation, the data controller is Gary Sadler Physiotherapy of 2a Salisbury Road, Cosham, Portsmouth, Hants, PO6 2PN.

#### We collect information in the following ways:

Where we collect information about you from

Sometimes you may give us your information to sign up for therapy, make an enquiry for therapy. Your information may also be shared with us by other allied health care professionals, for example Local Authorities, Social Services and General Practices. You should check their Privacy Policy before you provide your information to understand fully how they will process and share your data as, although we do our best to ensure that we only accept authorised information, we do not accept any responsibility or liability for the terms of these third-party policies. In any event we will notify you (within one month of receipt or as soon as we next communicate with you or disclose such information if earlier) when we receive information about you from these independent third parties, including the identity of such third party and the purposes for which we intend to use that information.

Sometimes we may combine information you provide to us with information available from external sources to gain a better understanding of our service users to improve our services.

The information we get from other organisations may depend on your privacy settings or the responses you give to such organisations, so you should regularly check them. This information comes from the following sources:

### Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties, including ourselves.

#### **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

## Information available publicly

This may include information found in places such as the electoral roll and information that has been published in articles/ newspapers.



# **Privacy Policy**

#### What personal data we collect and how we use it

The type and quantity of information we collect and how we use it depends on why you are providing it.

#### Service usership, Donations, Events and Purchases

If you purchase care from Gary Sadler Physiotherapy sign up for an event we will usually collect:

Your name
Your contact details
Your date of birth
Any telephone number used to contact us

#### Where it is appropriate we may also ask for:

We will only use your personal information when the law allows us to. Most commonly we will use your personal information where we need to perform the contract we have entered into with you, where we need to comply with a legal obligation or where it is necessary for our legitimate interests or those of a third party (and your interests and rights do not override those interests) including the following:

#### Providing you with the services, products or information you asked for

Keeping a record of your relationship with us.

Ensuring we know how you prefer to be contacted.

Understanding how we can improve our services, products or information.

In addition, we may disclose your personal information to third parties in the event that we sell or buy any business or assets (in which case we will disclose your personal information to the prospective seller or buyer) or if we are under a duty to disclose or share your personal information in order to comply with any legal obligation or enforce or protect any contractual or other rights, property or safety of our service users or others.

If we intend to use your personal information for any other purpose other than as listed above, we will notify you of such new purpose prior to such activity commencing unless we are unable to do so by law or it would require a disproportionate effort.

We do not anticipate that your personal information will be transferred except in relation to certain third-party partners (as previously described). You agree that we have the right to share your personal information which such third parties for such purposes.

## **Direct Marketing**

Our marketing communications include information about our latest news and we may intend to contact you to let you know about the progress we are making We make it easy for you to tell us how you want us to communicate, in a way that suits you.

If you are an existing service user, we will only contact you by electronic means (e-mail or SMS) with information about care provision.



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You have the right to ask us not to process your personal information. You can exercise your right to prevent such processing by checking certain 'opt out' boxes on the forms we use to collect your data. If you don't want to hear from us, that's fine. Just let us know by 'opting out' when you provide your data or contact us on (023) 9237 4220 or physio@garysadler.co.uk

We do not sell or share personal details to third parties for the purposes of marketing.

#### How we keep your data safe

We ensure that there are appropriate technical controls in place to protect your personal details. For example, our online forms are always encrypted and our network is protected and routinely monitored.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

#### Keeping your information up-to-date and how long we retain your data

We really appreciate it if you let us know if your contact details change.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In order to comply with law and to ensure we have the necessary information required in order to resolve future issues that might arise, we retain all personal data for a period of up to five years from collection. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

#### Your right to know what we know about you, make changes or ask us to stop using your data

You have a right to ask us whether and how we are processing your personal information, to request access to your processed personal data, to obtain information in relation to the purpose of such processing, the type of information processed, the sources and recipients of your information, how long we store your information, to correct inaccurate and complete incomplete information, to stop or restrict the scope of processing some or all of your personal data.



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You also have the right to ask us to erase your personal information and if it is not necessary for the purpose you provided it to us for, or you have withdrawn your consent for such processing and such processing is not for a task in the public interest or for public health, or required by law or litigation, we will do so without delay.

You have a right to ask for a copy of the information we hold about you which we will do free of charge. You may request a copy in an electronic format so that you can easily store it for your personal use and transmit it electronically to a third party. If there are any discrepancies in the information we provide, please let us know and we will correct it.

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. You can also ask us to give you a copy of the information and to stop using your information for a period of time if you believe we are not doing so lawfully. To submit a request by email, post or telephone, please use the contact information provided above.

Our address is 2a Salisbury Road, Cosham, Portsmouth, Hants, PO6 2PN You can contact us by post at the above address, by email at physio@garysadler.co.uk or by telephone on +44 (0) 23 9237 4220

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact the data privacy manager on (023) 9237 4220 or physio@garysadler.co.uk. You have the right to make a formal complaint with the Information Commissioners Office (ICO), the UK supervisory authority for data protection issues.

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 02392 374 220

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