

Osteosmith (Karen Smith) Privacy Notice

This privacy notice tells you what to expect I do with your personal information.

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Contact details

Telephone

07873 441256

Email

karen@osteosmith.com

What information I collect, use, and why

As an associate osteopath, I collect or use the following information **to provide patient care, services, and other goods using the privacy policies of both clinics I work from. On occasion if you make contact me directly I collect or use the following:**

- Name, address and contact details
- Gender
- Pronoun preferences
- Date of birth

- Health information (including medical conditions, allergies, medical requirements and medical history)
- Information about care needs (including disabilities, home conditions, medication and dietary requirements and general care provisions)
- Test results (including psychological evaluations, scans, bloods, x-rays, tissue tests and genetic tests)
- Payment details (including card or bank information for transfers and direct debits)

I also collect the following special category information **to provide patient care, services, and other goods**. This information is subject to additional protection due to its sensitive nature:

- Health information

I collect or use the following personal information **for information updates, marketing or market research purposes**:

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information
- IP addresses

I collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Customer or client accounts and records
- Financial transaction information

I also collect the following special category information **for dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Health information

Lawful bases and data protection rights

Under UK data protection law, I must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis I rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask me for copies of your personal information. You can request other information such as details about where I get personal information from and who I share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask me to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask me to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how I can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that I transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When I use consent as my lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, I must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact me using the contact details at the top of this privacy notice.

My lawful bases for the collection and use of your data

My lawful bases for collecting or using personal information **to provide patient care, services, and other goods** are:

- **Consent** - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legal obligation – I have to collect or use your information so I can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – I'm collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - As an Osteopath I will collect personal information from you to be able to advise on whether I can assist you or not. In most cases I will use the privacy policy of the individual clinic that you are a patient of. If you contact me directly through 'osteosmith' contact details I will collect the information to specifically refer you through to one of the clinics I work with if appropriate, or to another practitioner.

For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

My lawful bases for collecting or using personal information **for information updates, marketing or market research purposes** are:

- Consent - I have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – I am collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Collecting or personal information may benefit existing or potential patients e.g., notification of special offers, annual leave, changes to operating hours

For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

My lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - I have permission from you after I gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

- Legitimate interests – I am collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. My legitimate interests are:
 - o In order to deal with queries, complaints or claims I will collect personal information.

For more information on my use of legitimate interests as a lawful basis you can contact me using the contact details set out above.

Where I get personal information from

- Directly from you
- Family members or carers
- Other health and care providers
- Publicly available sources
- Not applicable

How long I keep information

Patient records are kept by each clinic as per each individual clinic's retention policy which can be accessed through their websites.

Osteosmith (Karen Smith) website analytics data is retained for no longer than necessary, typically for a maximum of **26 months**, after which it is automatically deleted.

Who I share information with

Data processors

Chatwin Solutions, Website management

This data processor does the following activities for me: analyse website traffic and usage trends, improve our website content, and usability ensure website security

Others I share personal information with

- Organisations I am legally obliged to share personal information with
- Publicly on my website, social media or other marketing and information media
- Suppliers and service providers

Duty of confidentiality

I am subject to a common law duty of confidentiality. However, there are circumstances where I will share relevant health and care information. These are where:

- you've provided me with your consent (I have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- I have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – I have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

How to complain

If you have any concerns about my use of your personal data, you can make a complaint to me using the contact details at the top of this privacy notice.

If you remain unhappy with how I have used your data after raising a complaint with me, you can also complain to the Information Commissioner's Office.

The ICO's address:

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

Helpline number: 0303 123 1113

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