

# Privacy Policy — NW Medical Services Ltd

*Last updated: 25/09/2025*

## Who we are

NW Medical Services is a provider of domiciliary ear-care services (microsuction ear wax removal) operating in Greater Manchester and Liverpool.

Director: Youssef Fararhi

Contact: [yf@nationwideearwaxremoval.co.uk](mailto:yf@nationwideearwaxremoval.co.uk)

## What we collect

We collect personal data required to arrange and provide clinical care, including full name, date of birth, contact details, medical history relevant to ear treatment, treatment notes, consent forms, and payment details where applicable. We may also process limited special category health data necessary for clinical care.

## Why we collect it (purposes) & lawful basis

- To provide healthcare services (legal basis: processing necessary for provision of healthcare / clinical care).
- To arrange bookings, confirmations, and communications (contractual performance and legitimate interests).
- To keep clinical records and follow up after treatment (legal medical record requirement).
- For explicit health data processing (special category) we rely on necessity for medical purposes and the individual's explicit consent where required.

## How we store and protect your data

- Signed consent forms and clinical notes are stored only as physical paper records, held securely in locked storage accessible only to authorised staff.
- Calendly is used solely for booking appointments and contact details.
- We do not use JotForm or other online form services for medical data collection.
- All digital admin accounts (e.g., Calendly, email) have 2FA enabled, and access is restricted to authorised staff only.

## **How long we keep your data (retention)**

We retain clinical records in line with UK NHS guidance:

- Adults: 8 years from last treatment
- Children: until their 25th birthday (or 26th if they were 17 at last treatment)
- Obstetric/maternity records: 25 years
- Deceased patient records: 8 years after death

**(See Retention Policy for full details.)**

## **Who we share data with**

We do not sell personal data.

We may share limited information with:

- Other healthcare professionals (with consent or where clinically necessary)
- Calendly (for booking management only, under Data Processing Addendum)
- Statutory bodies where required by law.

## **Your rights**

You have the right to access the personal data we hold about you (subject access request), request rectification, request erasure (where lawful), restrict processing, object to processing, and request data portability. We will respond to Subject Access Requests within one calendar month unless an extension is justified.

## **How to contact us**

For data queries, SARs or complaints: [yf@nationwideearwaxremoval.co.uk](mailto:yf@nationwideearwaxremoval.co.uk)

You can also contact the ICO at [ico.org.uk](https://ico.org.uk).

## **Changes to this policy**

We may update this policy; the “Last updated” date above will indicate the current version.

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# Retention Policy — NW Medical Services Ltd

*Last updated: 25/09/2025*

## Policy statement

We retain personal and clinical records only for as long as necessary to provide safe care and to meet our legal and professional obligations. We follow the NHS Records Management Code of Practice and related professional guidance when deciding retention periods.

## Retention schedule

Record type	Example files	Retention period	Notes / source
Adult clinical record	Consent, treatment notes, aftercare (physical)	8 years from date of last entry	NHS/BMA baseline
Child / young person clinical record	As above for minors (physical)	Until 25th birthday (or 26th if patient was 17 at discharge)	NHS/Trust guidance
Deceased patient records	Entire clinical file (physical)	8 years after death	NHS guidance
Obstetric records	Maternity notes (physical)	25 years	NHS guidance

Consent forms (signed)	Paper consent forms	8 years (follow patient type rule above)	NHS baseline
Booking & admin data (non-health)	Booking name/email/phone (Calendly)	2–7 years depending on accounting/contractual needs; delete/anonymise sooner where unnecessary	ICO guidance
Financial records / invoices	Payment receipts, invoices	6 years (HMRC requirement)	Required for tax/audit

### **Process for disposal / anonymisation**

- Paper records: securely shredded at end of retention period, with disposal logged.
- Digital admin data (Calendly/email): securely deleted or anonymised.
- If there is an outstanding complaint/legal reason, records may be retained longer, with the decision documented.

### **Review & exceptions**

We will review this policy annually and after any regulatory change. All exceptions (e.g., litigation hold) must be recorded in the Retention Register.