

# Privacy Notice – Patients, Visitors & Suppliers

## (How we process your personal information)



This notice explains what personal information we collect when we collect it and how we use this. During the course of our activities, we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will process your information.

### **Who are we?**

CMC Imaging Services Ltd: A company limited by Guarantee (03492885) trading as Heath Lodge Clinic

Our Registered Office is 70 Priory Road, Kenilworth, Warwickshire, CV8 1LQ. At Heath Lodge Clinic (“**we**” or “**us**”) take the issue of security and data protection very seriously. We comply with all relevant data protection laws, including the UK General Data Protection Regulation, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

We are notified as a Data Controller with the Office of the Information Commissioner under registration numbers Z8619496 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer (DPO) is RGDP LLP, who can be contacted by email as follows: [info@rgdp.co.uk](mailto:info@rgdp.co.uk).

Any questions relating to this notice and our privacy practices should be sent to the following email address: [info@rgdp.co.uk](mailto:info@rgdp.co.uk). Alternatively, you can contact us by writing to us at our Registered Office.

### **How we collect information from you and what information we collect**

We process the following information about you, as a patient, for the stated purposes below:

- Your name, age, and contact details;
- Details of your appointments and centre visits;
- Records about your health, treatment and care;
- Results of your imaging investigations;
- Information from other health professionals;
- Details of your credit/debit cards or banking information;
- Patient experience feedback and surveys; and
- Information about complaints and incidents.

We process the following information about visitors and suppliers for the stated purposes below

- Information relating to your visit, e.g., your company or organisations name, arrival and departure time, vehicle number plate number;
- Information about any access arrangements you may need;
- CCTV; and
- Visitors register, via our diary system.

### **Why we need this information about you and how it will be used**

We need your information and will use your information:

- to undertake and perform our obligations and duties to you in accordance with the terms of our contract or potential contract with you, your insurance company or other organisation making payment for the services which we provide to you;
- to enable us to supply you with the services and information which you have requested;

- to enable us to respond to any surveys or complaints made;
- to analyse the information we collect so that we can administer, support and improve and develop our business and the services we offer;
- to contact you in order to send you details of any changes to our service provision which may affect you;
- for all other purposes consistent with the proper performance of our operations and business; and
- to contact you for your views on our products and services.

### **What are the lawful bases for us processing your personal data?**

Under the UK General Data Protection Regulation, the lawful bases which we rely on for processing this information are:

- We have your consent;
- We have a contractual obligation, including pre-contractual negotiations;
- We have a legal obligation;
- We have a vital interest;
- We have a legitimate interest (such as surveys and the capturing of CCTV imagery);
- Where we are undertaking a public task.

### **Sharing of Your Information**

From time to time, we may lawfully share your personal data with other data controllers and data processors. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you, including the following:

- to other third party medical providers;
- If we enter into a joint venture with or merged with another business entity, your information may be disclosed to our new business partners or owners;
- If we are updating your details, your information may be disclosed to third parties (such as health providers);
- If we are investigating payments made or otherwise, your information may be disclosed to payment processors;
- If we are conducting a survey of our products and/ or service, your information may be disclosed to third parties assisting in the compilation and analysis of the survey results; and
- To conduct our day-to-day management of your agreement or potential agreement with us.

Other than where required to do so by law, we will not otherwise share, sell, or distribute any of the information you provide to us without your consent.

### **Transfers outside the UK**

Your information will only be processed within the UK, other than where authorised in accordance with Chapter V of the UK General Data Protection Regulation.

### **Security**

When we process your personal data, we take steps to make sure that your personal information is kept secure and safe. This includes ensuring there is adequate IT and physical security for all locations that data is stored, and we ensure that these measures are tested on a regular basis to ensure compliance.

### **How long we will keep your information**

We review our data retention periods regularly and will only hold your personal data for as long as is necessary for the relevant activity, or as required by law (we may be legally required to hold some types of information), or as set out in any relevant contract we have with you.

## Data Subjects' Rights

Under data protection law, you have certain data subjects' rights including:

Your right of access:	You have the right to ask us for copies of your personal information
Your right to rectification:	You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
Your right to erasure:	You have the right to ask us to erase your personal information in certain circumstances
Your right to restriction of processing:	You have the right to ask us to restrict the processing of your personal information in certain circumstances
Your right to object to processing:	You have the right to object to the processing of your personal information in certain circumstances
Your right to data portability:	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you would like to exercise any of your rights above, please contact: **info@rgdp.co.uk**.

## Queries and Concerns

If you have any queries or concerns about our use of your personal information, you can raise these with us by contacting our Data Protection Officer, RGDP LLP, who can be contacted as follows

info@rgdp.co.uk or 0131 222 3239

You also have the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are noted below:

Information Commissioner's Office  
Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF.  
Telephone: 0303 123 1113  
Email: [ico.org.uk](mailto:ico.org.uk)

The accuracy of your information is important to us - please help us keep our records updated by informing us of any changes to your email address and other contact details.

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