



Privacy Notice

Fine Surgery, referred to as "Fine Surgery" 'we' or 'our', is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us pursuant to the Data Protection (Jersey) Law 2018 ("DPJL").

Fine Surgery is a "Data Controller", which means we are responsible for deciding how we hold and use personal information. We are also registered with the Jersey Office of the Information Commissioner ("JOIC") – Registration No. 70252.

We will comply with data protection law, the principles of which says that the personal information we hold about you must be: -

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept your data only as long as necessary for the purposes we collected it.
- Kept securely.

Fine Surgery is accountable to you and the authorities for showing compliance with ("DPJL") and demonstrating how we are compliant.

The Data Protection Manager ("DPM")

We have appointed a DPM to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or how we handle your personal information, contact the DPM at dataprotection@FineSurgery.com.

You have the right to make a complaint at any time to the JOIC.

Contact details for these are outlined at the bottom of this Privacy Notice.

The Kind of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

To explain this to you, we will list our different services when we collect or use additional information about you.

How Is Your Personal Information Collected?

We collect personal information about you when you contact us, engage us to provide a service or provide use with your data for another specific purpose.

What information do we collect about you?

- Name
- Title
- Date of Birth
- Address
- Identification documents
- Your GP details.
- Telephone number
- Occupation
- Email address
- Signature
- Bank details
- Medical insurance details

What Special Category Data do we collect about you?

Fine Surgery provides data subjects with medical procedures and, as such, record health data, which is special category data pursuant to Article 9 of the DPJL.

Special Category data is defined as any data containing health, race, sexual orientation, sex life, genetics, trade union membership, or biometrics.

What Special Category information do we collect about you?

- Medication you are taking.
- Previous Cosmetic treatments
- Previous/current medical conditions
- Allergies

How We Will Use Information About You?

We will only use your personal information when the law allows us to.

Most commonly, we will use your personal information in the following circumstances:

- You have entered a **Contract** with us to provide you with a service; an example of this would be when you have engaged Fine Surgery to provide you with a surgical or non-surgical treatment.
- The processing is necessary for **Medical Purposes**; this allows Fine Surgery to process you personal and special category data when we are providing you with care and treatment following surgical or non-surgical treatment.
- Where it is necessary for our **Legitimate Interests** (or those of a third party), your interests and fundamental rights do not override those interests. An example of this is when we make contact with current and ex-patients to inform them of new services or evolving treatments, we believe may be of interest to them.

We may also use your personal information in the following situations, which are likely to be rare:

- Where you have given your **Consent** to contact you for a specific purpose, such as to receive marketing material about Fine Surgery services.

Change of purpose

We will only use your personal information for the purposes we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Data Sharing

We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, we may disclose your Personal Information to meet legal obligations, regulations, or valid governmental requests.

We use certain third parties also known as Processors to provide or support our services. We have appropriate agreements in place with those processors to ensure the safety of your information. For information on these processors please see the table below. We do not share your information with any processors for the purposes of direct marketing.

The current data processors used by Fine Surgery are.

Processor	Description of processing	Link to Privacy Notice
Propelfwd	Data Protection Managers. They provide advice and assistance with our data protection requirements and have no access to your data. They will only if you put in a data rights request or if we have a data incident/breach.	Privacy Notice - Propelfwd
MidexPro	This is our Patient CRM system. This holds all of our patient data in an encrypted database. It has cloud storage, again encrypted during transit and at rest.	Privacy Statement MidexPRO
Office 365	General IT Operation System	Microsoft Privacy Statement – Microsoft privacy

Processors are other organisations/services carefully chosen by Fine Surgery to process your information correctly and securely. In the case of organisations outside of Jersey, the United Kingdom and the European Economic Area (EEA);

(a) we have prior written instructions for the transfer or

(b) we have entered specific contractual terms with them to ensure that they treat your personal data in way equivalent to that in which they would be required if they were established in Jersey.

We ensure that your privacy rights are respected in line with this Notice and the same protection is given to your personal data as laid down by the DPJL.

Data Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Staff, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions, and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our DPM.

We have put in place procedures to deal with any suspected data security breach and notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data, whether we can achieve those purposes through other means, and the applicable legal requirements.

You can request our Data Retention Schedule from our DPM if required.

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

Rights of Access, Correction, Erasure, and Restriction

The personal information we hold about you must be accurate and current. Please keep us informed if your information changes during your relationship with us.

Under certain circumstances, by law, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This right enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This right enables you to have any incomplete or inaccurate data we hold about you corrected.

- **Request erasure** of your personal information. This right enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** your personal information where we rely on a legitimate interest (or those of a third party). There is something about your situation that makes you want to object to processing on this ground. You also have the right to object to processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This right enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request the erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, contact our DPM at dataprotection@FineSurgery.com.

You will not have to pay a fee to access your personal information (or exercise any other rights). However, we may charge a reasonable fee if your access request is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

How to request your information and what we may need from you

You can use the Data Subject Access Request form, available **on our Cookie Banner**. If you have any questions about this process or any of your rights, contact our DPM at dataprotection@FineSurgery.com

You can also email in your request, make your request over the telephone verbally to one of our team, whatever way you feel more comfortable with.

We will need to request specific information from you to help us confirm your identity and ensure your right to access the information (or exercise any of your other rights).

We will respond to your request without undue delay, but certainly within **Four Weeks** after satisfactory verification of your identity. In some circumstances, we can apply an eight-week extension to this time frame if the request is complex in nature and cannot be answered in the four-week time frame. If this is to happen, we will inform you as soon as possible.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, contact our DPM at dataprotection@FineSurgery.com.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or request that you confirm the accuracy of the information we hold on you.

Complaints

We want the chance to resolve any complaints you have about how we process your information. You have the right to complain to the JOIC about how we have used your data.

The details for each of these contacts are:

Fine Surgery

Suite 3.2 The Lido Medical Centre. St Saviours Road, St. Saviour, Jersey JE2 7LA

Telephone +44 (0) 1534 280781 or email dataprotection@FineSurgery.com

Jersey Office of the Information Commissioner

2nd Floor, 5 Castle Street, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or email enquiries@jerseyoic.org