

PRIVACY POLICY

It is important that you read this privacy notice together with any other privacy notice or fair processing notice that may be provided on specific occasions when collecting or processing your personal data, so that you are fully aware of how and why it is being used.

Dr Byrne committed to protecting your privacy, and will ensure that any information you provide to us will be collected and used in accordance with the General Data Protection Regulation and the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003.

This privacy policy sets out how Dr Byrne uses and protects any information that you give when you use this website, tell you about your privacy rights and how the law protects you. I am committed to storing and using your personal data in a safe, protected and responsible way.

Should you be asked to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

This privacy notice relates to the following:

1. About this service
2. The types of data collected when using this service
3. How is your personal data collected
4. Purposes for which your personal data will be used
5. Disclosures of personal data
6. Data security
7. Data retention
8. Your legal rights
9. Glossary of terms

1. About this service

Data controller

Dr Byrne is the controller and responsible for your personal data (collectively referred to as "Dr Byrne", "me" or "I" in this privacy notice).

She is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact me using the following:

email address dr.s.byrne@gmail.com ; phone +44(0) 7930 485166

postal address: Dr Byrne, The Magnolia Therapy Centre, 354 Mansfield Road, Nottingham NG5 2EF

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, I would appreciate the chance to deal with your concerns before you approach the ICO so please contact me in the first instance.

Changes to this privacy notice and your duty to inform Dr Byrne of changes to your personal data.

This version was updated in March 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with this service.

Third-party links

This website may contain links to other websites of interest. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. However, once you have used these links to leave the site, you should note that I do not have any control over that other website. Therefore, cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

You should exercise caution and read the privacy statement applicable to the website in question.

You can be assured that your personal information will never be shared or disclosed to third parties, unless required by law to do so.

2) The types of data collected when using this service

Personal data, or personal information, means any information about an individual from which that person can be identified.

Different types of personal data collected and stored include:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes home address, email address and telephone numbers.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Profile Data includes your feedback and survey responses.

Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Treatment Data includes information about the treatment you have received. This information could include 'health data' which is a special category of personal data and therefore requires us to take extra steps to ensure it is adequately protected.

Except for Treatment Data, other **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) are not collected. Nor, any information about criminal convictions and offences.

What happens if you fail to provide personal data?

Where there is a need to collect personal data by law or under the terms of a contract I have with you and you fail to provide that data when requested, I may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, I may have to cancel a service you have with us but will notify you if this is the case before doing so.

This website logs IP addresses and browser types to provide you with the best possible user experience and gives insight into consumer behaviour. You can browse the site without entering any personal information, and therefore remain anonymous during your visit. However, the enquiry form asks for personal information such as name, email address and telephone number to enable me to respond to your query.

3) How is your personal data collected

Different methods to collect data from and about you are as follows:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: apply for treatments and services; request marketing to be sent to you; enter a survey; or give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
analytics providers such as Google based inside OR outside the EU;
search information providers such as Google or Bing based inside OR outside the EU.

4) Purposes for which your personal data will be used

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where I need to perform the contract of treatment or service you are about to enter or have entered into with you.

Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where I need to comply with a legal or regulatory obligation.

Using your health data

Considering the services provided to my patients, it will be necessary to use information about your health. Even in the broadest sense of the word, 'health' information is a special category of personal data which requires an additional lawful basis for using this information. Where such information about your health is used for the purpose of providing treatment and services for you (or in preparation for me to provide services to you), the additional lawful basis on which I shall rely on will be that such use is necessary in order for me to provide you with health care or treatment.

In the table below table is a description of all the ways your personal data will be used, and the legal bases relied on to do so. Legitimate interests are identified where appropriate.

Note that your personal data may be processed for more than one lawful ground depending on the specific purpose for which it is being used.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new patient	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver our services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed	(a) Identity (b) Contact (c) Transaction (d) Marketing & Communications	Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary for us to provide health care or treatment
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Responding to a complaint	(a) Identity (b) Contact (c) Transaction (d) Marketing & Communications (e) health information	a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated & to study how patients use services) (d) Necessary for us to provide health care or treatment
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running of the business, provision of administration & IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Technical	(c) Necessary for our legitimate interests (to study how patients use services, to develop them, to grow the business and to inform marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Usage (b) Technical	(c) Necessary for our legitimate interests (to study how patients use services, to develop them, to grow our business and to inform marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to define types of patients for services, to keep website updated and relevant, to develop the business and to inform marketing strategy)

Marketing

You will receive marketing communications only if you have agreed to be contacted about developments in the services provided. You can ask marketing messages to be stopped at any time by emailing dr.s.byne@gmail.com

Cookies

What are cookies?

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Traffic log cookies identify which pages are being used. This helps to analyse data about web page traffic and improve the website in order to tailor it to patient needs. This information is only used for statistical analysis purposes and then the data is removed from the system.

A cookie does not give Dr Byrnes access to your computer or any information about you, other than the data you choose to share with this service.

Web tracking

As web tracking offers more chances to market website visitors across the Internet, you as a visitor to the www.gynaedr.co.uk website may be targeted with adverts from other websites. Google and third-party vendors might show

targeted adverts with the ability to opt out. You can change the cookie management settings in your web browser to stop these adverts. If you are a registered Facebook user, you may also receive targeted adverts from Facebook You can read about how Facebook works by following this link <https://en-gb.facebook.com/policies/cookies/>

Change of purpose in the use of personal data

Your personal data will only be used for the purposes for which it was collected it, unless it is reasonably considered that the data needs to be used for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email dr.s.byrne@gmail.com

If there is a need to use your personal data for an unrelated purpose, you will be notified and an explanation given for the legal basis on which to do so.

Please note that your personal data may be processed without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosure of personal data

Your personal data may be shared with the parties set out below for the purposes set out in the table above. Such third parties consist of:

- **IT:** Service providers acting as processors who provide IT and system administration services.
- **Advisors:** Professional advisers including lawyers, auditors and insurers who provide consultancy, legal, insurance and accounting services.
- **Authorities:** regulators such as the Care Quality Commission and other authorities who require reporting of processing activities in certain circumstances.

All third parties are obliged to respect the security of your personal data and to treat it in accordance with the law. Third-party service providers will not be allowed to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with instructions.

Your personal data will not be transferred outside the European Economic Area (EEA).

6. Data security

Appropriate security measures are in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on my instructions, and they are subject to a duty of confidentiality.

Procedures to deal with any suspected personal data breach are in place and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

Your personal data will be retained 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.

To determine the appropriate retention period for personal data, Dr Byrne will 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 personal data will be processed and whether this can be achieved through other means, and the applicable legal requirements.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, the include:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact Dr Byrne.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, if your request is clearly unfounded, repetitive or excessive, I reserve the right refuse to comply with your request in these circumstances.

What is required of you?

Dr Byrne may need to request specific information from you to help confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

All legitimate requests for information will be met within 20 days. Occasionally it may take longer than the stated period, if your request is particularly complex or you have made several requests. In this case, you will be notified and kept updated.

9. Glossary of terms

Legitimate Interest means the interest of this business in conducting and managing it to enable Dr Byrne to give you the best service and the best and most secure experience. Attempts are made to ensure consideration and balance any potential impact on you (both positive and negative) and your rights before your personal data is processed for legitimate interests. Your personal data will not be used for activities where interests are overridden by the impact on you (unless you have your consented or are otherwise required or permitted to by law). You can obtain further information about how legitimate interests are assessed against any potential impact on you in respect of specific activities by contacting Dr Byrne.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Necessary for us to provide health care or treatment means processing your special categories of personal data (i.e. health data) where it is necessary for the purposes of preventive or occupational medicine, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of EU or UK law or pursuant to contract with a health professional (subject to required conditions and safeguards).

More information on legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that is held about you. This enables you to have any incomplete or inaccurate data held about you corrected, although verification of the accuracy of the new data provided may be requested.

Request erasure of your personal data. This enables you to ask to delete or remove personal data where there is no good reason for me continuing to process it. You also have the right to ask to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where your information may have been processed unlawfully or where I am required to erase your personal data to comply with local law. However, please note that it may not always be possible to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where Dr Byrne is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object when your personal data is being processed for direct marketing purposes. On certain occasions, Dr Byrne may demonstrate that she has compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask this service to suspend the processing of your personal data in the following scenarios: (a) if you want to establish the data’s accuracy; (b) where you need Dr Byrne to hold the data even if it is longer required for her purposes, as you need it to establish, exercise or defend legal claims; or (c) you have objected to our use of your data but it is necessary to verify whether there is an overriding legitimate grounds to use it.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, certain products or services to you may not be able to be provided to you. You will be advised, if this is the case at the time you withdraw your consent.

This policy is effective from March 2019.

If you would like a copy of the information held about you, please send an email to: dr.s.byrne@gmail.com

If you believe that any information held about you is incorrect or incomplete, please write to or email me as soon as possible, at the above address. This will be corrected as soon as it is received