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## PRIVACY NOTICE

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### BACKGROUND:

Wells PhysioFit Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our patients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

**Company:** Wells PhysioFit Ltd - Registered in England under company number 13091044

Registered address:

Salisbury House, 20 Queen's Road, Weybridge, Surrey KT13 9XE

Main trading address:

63, Fairview Road, Headley Down, Hants GU35 8HQ

**Data Privacy Manager:** Heidi Wells

Email address: [heidi@wellsphysiofit.co.uk](mailto:heidi@wellsphysiofit.co.uk)

Telephone number: 07973345547

Postal Address: 63, Fairview Road, Headley Down, Hants GU35 8HQ

We are regulated by Chartered Society of Physiotherapy

We are members of CSP, HCPC.

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What is Personal Data?

Personal data is defined by the UK General Data Protection Regulation (based on EU Regulation 2016/679) (the "UK GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. **What Are My Rights?**

Under the UK GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way
- i) You may 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, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. However, please raise the matter with us first so that we can try to resolve the complaint.

#### 5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us :

- Name;
- Date of birth;
- Gender;
- Address;

- Status;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests;
- Medical data specific to your presenting condition on related to your presenting condition.
- Technical data including IP address and other technology on the devices you use to access our website

We may collect your personal data by direct interaction with you (by filling in forms or by corresponding with us by post, phone, email or otherwise or attending sessions with us). We may also collect personal data by automated technologies or interactions, for example when you interact with our website, you data we receive from third parties such as your GP.

## 6. **How Do You Use My Personal Data?**

Under the UK GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for

- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and/or post that you have opted-in to. You may unsubscribe or opt-out at any time by contacting a member of our reception team.
- Communicating with your GP or consultant and other third parties – see Part 9.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text and post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the UK GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 7. **How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Medical data is kept indefinitely on our secure computer system;
- Old written medical data will be held for 8 years or in the case of a minor, 8 years from their 18<sup>th</sup> birthday.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the UK GDPR.

If any personal data is transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the UK GDPR, as explained above in Part 8.

## 9. **Do You Share My Personal Data?**

We may share your personal data with other parties purely for medical reasons. This includes hospitals, consultants, GP's, medical insurance companies, insurance company intermediaries or any other parties we are medically referring you to or liaising with about your care.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the applicable privacy and data protection law, as described above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Your personal data will also be stored by our service providers, for example the software and hosting applications we use to store data. However, we have been advised that all such data is stored in the UK.

If, when dealing with any person to whom we share your data results in any personal data being transferred outside of the UK, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the UK GDPR, as explained above in Part 8.

## 10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 14 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

**11. How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of Heidi Wells:

Email address: [heidi@wellsphysiofit.co.uk](mailto:heidi@wellsphysiofit.co.uk).

Telephone number: 07973345547

Postal Address: 63, Fairview Road, Headley Down, Hants GU35 8HQ

**12. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website [www.wellsphysiofit.co.uk](http://www.wellsphysiofit.co.uk)