Privacy Notice for Patients

1. **Purpose**
   Hertfordshire Dental Group aims to meet the requirements of the Data Protection Act 2018, the United Kingdom General Data Protection Regulation (UK GDPR), the guidelines on the Information Commissioner's (ICO) website, and our professional guidelines and requirements.

   This privacy notice describes the type of personal information we hold, why we keep it, and what we do with it.

2. **Registered name**
   The data controller is Dr Simon Oldham.

3. **Contact details**
   If you have an enquiry or request, please contact Jade Pateman

   Hertfordshire Dental Group - Ware
   6 Star Street, Ware, Herts, SG12 7AA
   Email: pmware@hertsdg.co.uk
   Phone: 01920 465908

   This privacy notice is also available on the practice website https:hertfordshiredentalgroup.co.uk/ or a hard copy can be requested from the Practice by emailing or calling directly.

4. **What information we collect, use, and why**
   The personal data we process includes:

   Name, address, contact details, gender, pronoun preferences, date of birth, nationality, NHS number, medical history, dental history, family medical history, family contact details, emergency contact details, marital status, information about care needs, financial details, doctor's details, treatment plans, consent, X-rays, clinical photographs, digital scans, study models, appointment dates, details of complaints, call recordings and CCTV recordings.

   We may also process more sensitive special category data, including:

   Ethnicity, race, religion, health records, sex life information, or sexual orientation.

   The reasons we process the data include:

   a. To fulfil our contract with you
   b. To maintain a contemporaneous clinical record
   c. To discuss treatment options
   d. To provide dental prevention and oral health advice
   e. To ensure any medication we prescribe is suitable
   f. To modify treatments based on individual needs
   g. To meet our obligations under the Equality Act 2010
   h. To carry out financial transactions
   i. To manage appointments, recall arrangements and send reminders
   j. To communicate with your next of kin in an emergency
   k. To communicate with parents or carers about the person being cared for
   l. To refer to other dentists, doctors and health professionals as required
   m. For debt recovery
   n. To continually improve the care and service you receive from us
   o. To assist with safeguarding or public protection concerns
   p. To assist with dealing with queries, complaints or claims

5. **Lawful basis (Personal data)**
   Our lawful bases for processing personal data:

   a. A legitimate interest to provide evidence-based dental care to patients safely and effectively
   b. Consent of the data subject
   c. To comply with our legal obligations

6. **Lawful basis (Special category data)**
   Our Article 9 conditions for processing special category data:

   a. Processing is necessary for ethical and professional health care purposes
   b. Processing is necessary to monitor and assess the quality of opportunity or treatment between different groups
   c. Consent of the data subject

7. **Data protection rights**
   You have the following personal data rights:

   a. The right of access - you can ask for a copy of the data we hold about you. We do not usually charge you for copies of your information; if we charge you, we will explain why
   b. The right to rectification - you can ask us to correct or delete information if it is inaccurate or incomplete. If we have disclosed that information to a third party, we will let them know about the change
   c. The right to erasure - you can ask us to delete your personal data. For legal reasons, we may be unable to erase certain information (for example, information about your dental treatment). However, we can, if you ask us to, delete some contact details and other non-clinical information
   d. The right to restrict processing - you can ask us to limit how we use your personal data. For example, stop sending you appointment reminders or information about our service
   e. The right to data portability - you can ask us to transfer your personal data to someone else. For example, supplying your information electronically to another dentist
   f. The right to withdraw consent - you can withdraw your consent to the processing of your personal data at any time. For example, even if you have given us consent to send you marketing information, you may withdraw that consent

8. **Where we get personal information from**
   We obtain your details when you enquire about our care and service, when you join the practice, when you subscribe to our newsletter or register online, when you complete a registration or medical history form, from family members or carers, and when another healthcare provider refers you for treatment at our practice.

   We also use CCTV to:

   a. Protect the practice premises and property
   b. Increase the safety of patients, staff and visitors
   c. Deter criminal activity and anti-social behaviour
   d. Assist in the apprehension, identification and prosecution of offenders (if required)
   e. Provide evidence to a court or tribunal (if required)

9. **How long we keep information**
   We minimise the data that we keep, and do not keep it for longer than necessary.

   We keep your records for 11 years after the date of your last visit to the Practice or until you reach the age of 25, whichever is longer. At your request, we will delete non-essential information (for example, some contact details) before the end of this period.

Images captured with CCTV will be kept and destroyed securely after 3 months unless they are needed for longer due to ongoing investigation, legal proceedings, or regulatory compliance.

10. **How we store information**
    We store your personal information securely [on our practice computer system and in a manual filing system. Only those working at the practice have access to your information. They understand their legal responsibility to maintain confidentiality and follow practice procedures to ensure this.

    We take precautions to ensure the security of the practice premises, the practice filing systems and computers.

    We use high-quality specialist dental software to record and use your personal information safely and effectively. Our computer system has a secure audit trail, and we back up information routinely.

11. **Sharing information**
    To provide you with appropriate care, we might need to share personal data with the following; however, only the minimum information required will be shared:

    a. Another dentist or other health professional who is caring for you
    b. Your GP, consultant, or Occupational Health Professional
    c. A laboratory
    d. The Inland Revenue
    e. A private dental scheme, if you are a member
    f. Safeguarding organisations

12. **Sharing CCTV recordings**
    When using or processing CCTV recordings, we will respect the legal rights of the individuals shown in them. We will not share images or recordings except in the following circumstances:

    a. If requested by the local authority, police or courts for the investigation, prevention or prosecution of anti-social behaviour or criminal activity
    b. For bringing or defending a legal claim
    c. To comply with a police warrant or an order given by a court or tribunal

13. **Duty of confidentiality**
    Exceptional circumstances might override the duty to maintain confidentiality. We will inform you of requests to share personal information where possible. The decision to disclose information will only be taken by senior staff. Examples include:

    a. Situations where there is a serious public health risk or risk of harm to other individuals
    b. When information is required by the police to prevent or detect crime or to apprehend or prosecute offenders (if not providing the information would prejudice these purposes)
    c. In response to a court order
    d. To enable a dentist to pursue a legal claim against a patient

14. **How to complain**
    If you have any comments, suggestions, or complaints about how we use your data, you can contact us using the contact details at the top of this privacy notice.

    If you remain unhappy with our response or feel unable to discuss it with the Practice, you can contact the Information Commissioner's Office (ICO) on 0303 123 1113 or by visiting https://www.ico.org.uk/make-a-complaint.

15. **Review and Revision**
    This privacy notice is reviewed annually and updated to ensure its effectiveness and compliance with current regulations, guidance, and standards.