

## **STEP FORWARD PODIATRY - PRIVACY NOTICE**

This Privacy Policy describes how and when we collect, use, and share information when you attend an appointment at our clinics, purchase a product from us, contact us, or otherwise use our services. This is to comply with the General Data Protection Regulations (GDPR) 2018.

### **Information we collect**

To aid your treatment or as part of purchasing something from Step Forward Podiatry you will normally provide us with certain information, such as your name, email address, postal address, medical information and payment information. We will store your information on an electronic patient record and diary system which is fully password protected.

### **Why we need your information and how we use it**

We rely on a number of legal bases to collect, use, and share your information, including:

- where it is necessary for the purposes of the provision of health care as needed to provide our services, such as when we use your information to fulfil your podiatry assessment and treatment, or to provide customer support;
- when you have provided your affirmative consent, which you may revoke at any time;
- if necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law;

### **Marketing**

As a practice, we do not use your contact details to send direct marketing material eg product offers. However we may use your details to inform you of changes to the clinics such as a change of practitioner or a change to our fees which are likely to directly affect you with regards to your treatment.

### **Information sharing and disclosure**

Information about our patients is important to Step Forward Podiatry. We share your personal information for very limited reasons and in limited circumstances, as follows:

- Medical professionals. Only with your consent will we share information with medical professionals such as your GP or consultant to allow continuity of care.
- Business transfers. If we sell or merge Step Forward Podiatry, we may disclose your information as part of that transaction, only to the extent permitted by law and with your consent.
- Compliance with laws. We may collect, use, retain, and share your information if we are legally required to.

## Data retention

We retain your personal information only for as long as necessary to provide you with my services and as described in my Privacy Policy. However, we may also be required to retain this information to comply with my legal and regulatory obligations, to resolve disputes, and to enforce my agreements. The retention of podiatry records is normally a minimum of 8 years, after the last appointment. For customers who are not patients but may have bought products from Instep Podiatry we will keep any data you may have provided for a minimum of 6 years in line with tax legislation.

## Transfers of personal information outside the EU

Where possible, we are committed to ensuring we store and process your personal information within the EU and ensuring our patient software fully complies with GDPR. We may also store and process your information through third-party hosting services in the US and other jurisdictions. As a result, we may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If we require to transfer information about you outside of the EU, we rely on Privacy Shield as the legal basis for the transfer.

## Your rights

You have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. We describe these rights below:

- Access. You have the right to access and receive a copy of the personal information we hold about you by contacting us using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict our use of, or delete your personal information. In the case of health records these are normally exempt from change and deletion requests.
- Object. You can object to (i) our processing of some of your information based on our legitimate interests and (ii) receiving marketing messages from us after providing your express consent to receive them. In such cases, we will delete your personal information unless we have compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- Complain. If you wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), please contact us in the first instance to raise any concerns. You also have the right to contact the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk).

## How to contact us

For purposes of the GDPR, we, (Step Forward Podiatry), are the data controllers of your personal information. If you have any questions or concerns, you may email me at: [info@stepforwardpodiatry.co.uk](mailto:info@stepforwardpodiatry.co.uk).