

PRIVACY POLICY FOR THE HEALTH DOCTORS

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THE HEALTH DOCTORS Ltd holds some information about you. This document outlines how that information is used, whom we may share that information with and how we keep it secure. This notice does not provide exhaustive detail. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent by EMAIL TO pa@thehealthdoctors.co.uk

This Privacy Policy was written and applied in May 2018 in preparation for the application of GDPR (General Data Protection Regulation) in May 2018. We keep our Privacy Policy under regular review and have updated this as needed with the latest changes having been made in January 2024.

1. What We Do

We offer medical advice and treatments based on diagnosis of medical conditions. We take into account nutrition, lifestyle, environmental factors, as well as the results from blood , urine, stool and other laboratory testing to help us understand the underlying causes of your condition. We aim thereby to provide an effective approach to the treatment of acute and chronic health issues.

2. How We Obtain Your Personal Data

Information provided by you

You provide us with personal data in the following ways:

- By completing a health questionnaire
- By signing a consent to treatment form
- During a medical consultation
- Through email, over the telephone or by post
- By making credit card or online payments

This may include the following information:

- Basic details such as name, address, contact details and next of kin
- Details of contact we have had with you such as referrals and appointment requests
- Health information including your previous medical history, dietary, lifestyle, supplement and medicine details, biochemical test results, clinic notes and health improvement plans
- GP and specialist contact information
- Banking details

We use this information in order to provide you with healthcare services and to receive appropriate payments. This means that the legal basis of our holding your personal data is with your **consent for the specific purpose of your healthcare**. Under GDPR this is known as Consent

We currently hold records of your medical history and clinic notes on Semble, a practice management software. We confirm that any international transfers of patient data will be carried out in compliance with the UK GDPR and Data Protection Act 2018.. All consultant records and test results are held electronically in secure systems that are deemed GDPR compliant.

Following your last contact with us we will retain your medical records for 10 years electronically on Semble and/or IceDrive (all paper records are scanned and stored electronically on Semble or IceDrive). IceDrive is fully committed to their users privacy, as outlined in their Privacy Policy. As such, they are fully compliant with the GDPR regulations.

Information we get from other sources

We may obtain sensitive medical information in the form of correspondence from other doctors and practitioners, and test results from laboratories. We use this information in order to provide you with direct healthcare. This means that the legal basis of our holding your personal data is for the specific purpose of your healthcare.

We may seek to obtain sensitive information from other healthcare providers. The provision of this information is subject to you giving us your express consent. If we do not receive this consent from you, we will not be able to coordinate your healthcare with that provided by other providers which means the healthcare provided by us may be less effective.

3. How we use your personal data

We act as a data controller for use of your personal data to provide direct healthcare. We also act as a controller and processor in regard to the processing of your data from third parties such as laboratories and other healthcare providers. We act as a data controller and processor in regard to the processing of credit card and online payments.

We undertake at all times to protect your personal data in a manner which is consistent with our duty of professional confidence and the requirements of the General Data Protection Regulation (GDPR) concerning data protection. We will also take reasonable security measures to protect your personal data storage.

We may share your case history in an anonymised form with our peers for the purpose of professional development. This may be at clinical supervision meetings or medical conferences

We may also use your data to inform you of changes in our operating procedures or address details.

4. Do you share my information with other organisations?

We will keep information about you confidential. We will only disclose your information with others with your express consent.

We will seek your express consent before sharing your information with laboratories or imaging services except for the following 3 unique identifiers which are required by laboratories to be on test requests before they can proceed with testing: Family Name, Given Name, Date of Birth.

We will seek your express consent before sharing your information with your GP or other healthcare providers. However, if we believe that your life is in danger then we may pass your information onto an appropriate authority (such as the police, social services in the case of a child or vulnerable adult, or GP in case of self-harm) using the legal basis of vital interests.

We may use your personal data where there is an overriding public interest in using the information e.g. in order to safeguard an individual, or to prevent a serious crime. Also, where there is a legal requirement such as a formal court order. You should be aware that the General Medical Council and the Care Quality Commission are legally entitled to obtain your information from us under exemptions, known as “derogations”, made by the UK to the GDPR.

5. What are your rights?

Every individual has the right to see, amend, delete or have a copy, of data held that can identify you, with some exceptions. You do not need to give a reason to see your data.

If you want to access your data you must make a request in writing to the Data Controller at the postal or email address at the end of this document. Under special circumstances, some information may be withheld. We will respond within 28 working days from receiving the request and any necessary information from you. Our response will include the details of the personal data we hold on you including:

- Sources from which we acquired the information
- The purposes of processing the information
- Persons or entities with whom we are sharing the information

You have the right, subject to exemptions, to ask to:

- Have your information deleted
- Have your information corrected or updated where it is no longer accurate
- Ask us to stop processing information about you where we are not required to do so by law or in accordance with GMC and other guidelines.
- Receive a copy of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller, without hindrance from us.
- Object at any time to the processing of personal data concerning you

We do not carry out any automated processing, which could lead to automated decisions based on your personal data.

If you wish to apply any of the above rights please write to the postal or email address at the end of this document.

6. What safeguards are in place to ensure data that identifies me is secure?

We only use information that may identify you in accordance with GDPR. This requires us to process personal data only if there is a legitimate basis for doing so, and any processing must be fair and lawful.

Within the health sector, we also have to follow the common-law duty of confidence, which means that where identifiable information about you has been given in confidence, it should be treated as confidential and only shared for the purpose of providing direct healthcare. We will protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on

equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it). We ensure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

The Health Doctors is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. A copy of the registration is available through the ICO website (search by business name).

7. How long do you hold confidential information for?

Following your last contact with us we will retain your electronic medical records for 10 years unless instructed otherwise.

8. Complaints

If you have a complaint regarding the use of your personal data then please contact us by writing or emailing to this address, and we will do our best to help you;

Data Controller
The Health Doctors
9 Devonshire Place, London
W1G 6HP

Or email to; pa@thehealthdoctors.co.uk

If your complaint is not resolved to your satisfaction and you wish to make a formal complaint (about the use of your personal data only) to the Information Commissioner's Office (ICO). The website is;

<https://ico.org.uk/for-the-public/>

You can also contact them on 01625 545745 or 0303 1231113.

All other complaints should first be made to us at the above address, but if you wish to take matters further our Complaints Resolution Procedure is available on request.