## Adult Neurology Physiotherapy Services&nbsp;

## Privacy Policy

This is the privacy policy of Neuro Rehabilitation Kent. In this document, "we", "our", or "us" refer to Neuro Rehabilitation Kent.

We are a Physiotherapy practice specialising in the rehabilitation and treatment of people with neurological impairments.

Our registered office is at Oak House, Lower Haysden Lane, Tunbridge, Kent. TN11 9BD.

## Introduction

1. This is a notice to inform you of our policy about all information that we receive and record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information.
2. As healthcare professionals we take seriously the protection of your privacy and confidentiality and we hereby undertake to do that. Also, we understand that all our clients and visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
3. We hereby undertake to preserve the confidentiality of all information you provide to us, with electronic data being password protected and paper data stored in a locked fireproof environment. This policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
4. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at [www.knowyourprivacyrights.org](http://www.knowyourprivacyrights.org)

## The bases on which we process information about you

The law requires us to determine under which of the following six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes, then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

# Information we process because we have a patient consent form signed by you.

When you become our patient, a contract is formed between you and us as a result of you signing the consent form. (In the event of the patient having been deemed not to have capacity, the consent form may be signed by a person having power of attorney for the client regarding health & well being issues. In this instance all provisions of this policy will apply to the client.)

The service we provide to you as a patient necessarily entails you to provide us with personal information. We process this information on the basis there is a ‘contract’ between us.

Additionally, we may aggregate this information and generally use it to provide class information, for example to monitor the performance of a particular service or treatment we provide. If we use it for this purpose, you as an individual will not be personally identifiable.

We shall continue to process this information until the ‘contract’ ends. Please note however that we have a statutory requirement to retain your information and any relevant notes on your treatment for a period of 8 years.

# Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information.

Sometimes you might give your consent implicitly, such as when you write to us requesting a response.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally.

We may also need to liaise with other medical professionals, ie. your GP or Consultant regarding your treatment and care. The signing of your consent form enables us to do this.

We will continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by writing to us at our registered office or by e-mail at info@neurorehabkent.com. If you do so, we shall not be able to provide our services further.

# Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do so after having given careful consideration to:-

* + whether we could achieve the same objective by other means
  + whether processing (or not processing) might cause you harm
  + whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

* + record-keeping for the proper and necessary administration of our business
  + protecting and asserting your rights, our rights, or the rights of any other third party
  + insuring against or obtaining professional advice that is required to manage business risk
  + protecting your interests where we believe we have a duty to do so

# Information we process because we have a legal obligation

We are subject to the law like everyone else. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

As mentioned above, we also have a statutory duty to retain your information and notes for 8 years.

Both of the above points may include your personal information.

## Specific uses of information you provide to us

# Job application and employment

If you send us information in connection with a job application, we may keep it for up to three years in case we decide to contact you at a later date.

If we employ you, we collect personal information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment. After your employment has ended, we will keep your file for six years before destroying or deleting it.

# Contacting us

1. When you contact us, whether by telephone, by post, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need. Also, any information sent to us via the contact form on the website will be kept secure, handled appropriately and deleted in a month if no further action is taken.

We record your request and our reply in order to increase the efficiency of our business and to refer to in the future if the need arises.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

# Complaints

When we receive a written complaint, we record all the information you have given to us and will send you a copy of our complaints procedure.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If you complain about any of the content on our website or in any brochure, we shall investigate your written complaint. If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

If we think your complaint is vexatious or without any basis, we shall not correspond with you about it. However, we may contact relevant authorities or take legal advice if we deem it appropriate.

## Use of information we collect through automated systems when you visit our website

# Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

* 1. to track how you use our website
  2. to record whether you have seen specific messages we display on our website
  3. to keep you signed in our site
  4. to record your answers to surveys and questionnaires on our site while you complete them

# Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

During the course of our work we utilise providers of software applications such as Weebly, Xero and Mailchimp. All of these companies are GDPR compliant and we can provide you with copies of their privacy policies on request.

## Disclosure and sharing of your information

## Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is made up from your personal information from third parties whose services we use.

## Access to your own information

# Access to your personal information

* 1. At any time you may review or update or request that we remove personally identifiable information that we hold about you. To obtain a copy of any information that is not provided on our website you may send us a request at info@neurorehab.com
  2. After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.
  3. When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting your request or otherwise taking any action. This is important to safeguard your information.

## Other matters

## How you can complain about our privacy policy

* 1. If you are not happy with our privacy policy or if you have any complaint with respect to how we process your personal information then you should tell us by email. Our address is info@neurorehabkent.com.
  2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
  3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

# Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information for 8 years as required by our statutory body or for as long as required by us:

* 1. to provide you with the services you have requested;
  2. to comply with other law, including for the period demanded by our tax authorities;
  3. to support a claim or defence in court.

# Compliance with the law

Our privacy policy has been compiled so as to comply with the laws of the legal jurisdictions in the UK and the European Union.

**Review of this privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.

**Neuro Rehabilitation Kent May 2018**