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Hambly's Natural Health Centre, The Old Dairy, Wadhurst, East Sussex TN5 6DE

Privacy Notice 2026

1. Who We Are This practice is a private Allied Health Professional service providing Osteopathy. We are responsible for protecting your personal information under UK GDPR, the Data Protection Act 2018, and the **Data (Use and Access) Act 2025 (DUAA)**.

2. What Information We Collect

We collect:

- identity and contact details;
- medical and developmental history;
- treatment notes and reports;
- communications with you;
- digital submissions (emails, forms, attachments);
- consent records;
- safeguarding-related information where legally required.

3. Why We Collect Your Information

We use your information to:

- provide osteopathy assessment and treatment;
- make an accurate diagnosis and management plan;
- communicate with you;
- communicate with other medical professionals with your consent;
- maintain accurate clinical records;
- enable us to refer you to the correct person when needed;
- meet legal, regulatory, and DUAA obligations;
- respond to complaints using the DUAA-mandated data protection complaints process.

4. DUAA-Specific Requirements

Under DUAA 2025, we must:

- provide clear information about how your data is used;
- ensure digital access routes are available for communication and complaints;
- maintain a DUAA-compliant audit trail for data-related decisions;
- explain any automated decision-making (we do not use automated clinical decision-making systems for osteopathic care, we do use AI to assist with exercise prescription but this is always checked by a clinician);
- apply strengthened protections for children's data;
- follow updated rules on subject access and data reuse.

5. How We Store and Protect Your Data Your online data is stored securely using encrypted systems with access controls. Digital submissions are logged in a DUAA-compliant audit trail.

Paper files are still in existence for patients seen before we adopted our online system. These are stored securely in lockable filing cabinets on the practice premises with access limited to healthcare staff only. Some overflow paper files are stored in the practice principals home in secured boxes.

We retain records according to statutory healthcare retention periods. (8 years for adults, 25 years for children after last session). Online files can then be archived, and paper files securely shredded in an industrial shredder with waste removed securely and confidentially.

6. Sharing Your Information We only share your information when necessary for your care or safety, when legally required, or when you request it. We do not sell or transfer your data for marketing.

7. Your Rights Under DUAA and UK GDPR You have the right to:

- access your data;
- request correction (we reserve the right to maintain a record of the original data if we deem this relevant, as well as the corrected version);
- understand how your data is used;
- challenge automated decisions;
- raise concerns through our DUAA-compliant complaints process;
- contact the ICO if you believe your rights have been breached.

Medical records cannot be deleted within the timeframe they are active and are being retained.

8. How to Raise a Concern

You may raise a data-related concern directly with the clinic-please see contact details above.

If unresolved, you may contact the **Information Commissioner's Office (ICO)**. Helpline: 0303 123 1113 (Mon-Fri 9am-5pm) or www.ico.org.uk