

## Privacy Policy 2023

The Dental Design Studio are committed to protecting and respecting your privacy.

#### 1. Introduction

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and importantly, how we'll keep it safe.

We want you to be fully informed about your rights, and how The Dental Design Studio uses your data.

We hope this Notice will answer any questions you have but if not, please do get in touch with us.

When this Privacy Notice changes we will notify you.

## 2. What is The Dental Design Studio?

The Dental Design Studio is group of dental practices located throughout the UK providing NHS and Private Dental Treatment.

We are committed to:

- Supporting our patients in the treatments that we provide to promote dental health
- Using our industry knowledge to benefit the dental profession and patients
- Sharing our collective knowledge and expertise
- Placing patients and staff at the heart of everything we do

#### 3. The legal bases we operate on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### Consent

In specific situations, we can collect and process your data with your consent. To provide you with the best possible information you can consent to receive practice information to stay up-to-date with what the we are doing on your behalf, or new services we offer. We try to give you control over what you receive.

#### **Contractual obligations**

There are times when we need your personal data to comply with our contractual obligations. For example, if you undergo NHS dental treatment, we will collect your address and date of birth pass them to the NHS.

#### Legal compliance

If the law requires us to, we may need to collect and process your data. For example, if your data is requested by the General Dental Council to comply with a legal process they are involved with.

## 4. When do we collect your personal data?

- When you contract the practice to register or book an appointment
- When you accept a course of dental treatment and sign a treatment plan
- When you create an account on our website to book online
- When you contact us by any means with gueries, complaints etc.
- When you ask one of our staff to email you information about a product or service
- When you comment on or review our products and services
- Any individual may access personal data related to them, including opinions.
   So, if your comment or review includes information about a staff member who provided that service, it may be passed on to them
- When you use one of our dental practices which usually have CCTV systems operated for the security of both customers and staff. These systems may record your image during your visit

### 5. What sort of personal data to we collect?

• Your name, sex, date of birth, medical history, telephone number, email address. If you receive NHS which and are entitled to an exemption, hospital or dental referrals from other healthcare providers. Whether you have a disability which we should make reasonable adjustments for

- We collect notes from our conversations with you, details of any complaints or comments you make
- Copies of documents you provide to assist us in providing dental services to you, specific to your situation, such as a dental insurance policy
- Details of your visits to our practices
- Direct Debit information for the purposes of collecting your dental membership fee. We do not store other payment information
- Your comments and product reviews
- Your image may be recorded on CCTV when you visit one of our practices
- We may record telephone conversations to offer you additional security, resolve complaints, for regulatory compliance and to improve our service standards. Conversations may also be monitored for staff training purposes. You will be alerted to this when you call.

## 6. How and why do we use your personal data?

We want to give you the best possible patient experience. One way we intend to achieve that is to get the richest, fullest picture we can of who you are by combining the data we have about you.

The data privacy law allows this as part of our legitimate interest in understanding our patients and providing the highest levels of service.

You can change how we use your data. See the 'What are my rights?' section below.

If you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services. For example, if you chose to opt-out of the emails, you will not receive a written reminder that you are due for a check-up.

#### Here's how we'll use your personal data and why:

To process any NHS or private insurance dental claims that are made. If we
don't collect your personal data during your visit, we won't be able to process
your claim and comply with our legal obligations. For example, your details
may need to be passed to the NHS as part of your dental treatment, and we
may keep your details for a reasonable period afterwards in order to fulfil
any contractual obligations.

- To respond to your queries, refund requests and complaints. Handling the
  information you sent enables us to respond. We may also keep a record of
  these to inform any future communication with us and to demonstrate how
  we communicated with you throughout. We do this on the basis of our
  contractual obligations to you, our legal obligations and our legitimate
  interests in providing you with the best service and understanding how we
  can improve our service based on your experience.
- To protect our customers, premises, assets and staff from crime, we may
  operate CCTV systems in our dental practices which record images for
  security. We do this on the basis of our legitimate business interests. If we
  discover any criminal activity or alleged criminal activity through our use of
  CCTV we will process this data for the purposes of preventing or detecting
  unlawful acts.
- With your consent, we will use your personal data, preferences and details to keep you informed by email, text, post, telephone about when you are due for a dental appointment.

You are free to opt out of hearing from us via any of these channels at any time.

- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to pricing for dental membership plans. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests
- To comply with our contractual or legal obligations to share data with law enforcement
- To send you survey and feedback requests to help improve our services.
   These messages will not include any promotional content and do not require prior consent when sent by email or text message.

#### 7. How we protect your personal data

We know how much data security matters to all our patients. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

Access to your personal data is password-protected

We regularly monitor our system for possible vulnerabilities and attacks, and back up data to ensure it is not lost. The Dental Design Studio has a long and proud history to respect and protect.

## 8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely

For example, with dental records are kept for a minimum of 10 years from the date of your last course of treatment.

## 9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, the NHS or a dental plan provider such as Denplan.

We may also disclose your personal data to the police or other enforcement, regulatory or Government body when we believe such disclosure is appropriate to comply with the law. These requests are assessed on a case-by-case basis and take the privacy of our patients into consideration.

We may, from time to time, expand, reduce or evolve and this may involve the transfer of divisions or the whole business to new owners. If this happens, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

For further information please contact our Data Protection Officer.

## 10. Where your personal data may be processed

The data that we collect from you (or any third party for whom you are acting) will not be transferred to, or stored at, a destination outside the European Economic Area ("EEA").

#### 11. What are your rights over your personal data?

#### An overview of your different rights

You have the right to request:

Access to the personal data we hold about you, free of charge in most cases

- The correction of your personal data when incorrect, out of date or incomplete. For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end
- That we stop using your personal data for direct marketing
- That we stop any consent-based processing of your personal data after you withdraw that consent

You have the right to request a copy of any information about you that The Dental Design Studio holds at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact our Data Protection Officer at <a href="mailto:dpo@the-dds.co.uk">dpo@the-dds.co.uk</a> or you can contact your local practice who can pass on any such requests on your behalf.

If we choose not to action your request we will explain to you the reasons for our refusal.

#### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

#### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### **Confirming your identity**

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice, or indeed to draw on your benefits of membership to ensure that we are talking to who we should be talking to. If you have authorised a third party such as a family member to submit a request on your behalf, we will ask them to prove they have your permission to act.

# 12. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

You can contact your local dental practice by phone, email, or post You can visit your local dental practice in person to request this You can contact us via our Dental Design Studio Website communication section Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## 13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to <a href="https://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a>

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

## 14. Any questions?

This Privacy Notice has been written to set out the way we handle your personal data and your rights to control it.

If you have any questions you haven't found the answer to above, please contact our Data Protection Officer who will be pleased to help you:

Email us at dpo@the-dds.co.uk or write to us at Data Protection Officer, 1 Murray Road, Northwood, Middlesex, HA6 2YP