A: 4 Elsworthy, Thames Ditton, Surrey, KT7 OYP • T: 07956 11 85 11 •

E: info@sainssurgical.com

# **Privacy Notice**

# Who We Are

Sains Surgical Ltd ('we') gather and process your personal information in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Sains Surgical Ltd's registered office is at The White & Company Group, 6<sup>th</sup> Floor, Blackfriars House, Parsonage, Manchester, M3 2JA and we are a company registered in England and Wales under company number 07783977. We are registered on the Information Commissioner's Office Register; registration number ZA007852, and act as the data controller when processing your data. Our designated Data Protection Appointed Person is Sharan Sains, who can be contacted at info@sainssurgical.com.

# **Information That We Collect**

Sains Surgical Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Home Telephone Number
- Mobile Telephone Number
- Special Category Data (i.e. health/medical information)

We collect information in the below ways: -

Through yourself, your GP, insurance company and through your medical records as held by the NHS and through any private organisations you have had previous treatment with.

## How We Use Your Personal Data

Sains Surgical Ltd takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

• We collect your personal data to provide your medical treatment and care and for the purposes of billing for such services.



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# Your Rights

You have the right to access any personal information that Sains Surgical Ltd processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

## **Sharing and Disclosing Your Personal Information**

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. Sains Surgical Ltd uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures.

#### McKenzie Knight & Partners Ltd

We use McKenzie Knights & Partners Ltd to do our bookkeeping and tax returns and they act in the capacity of a processor on our behalf. The only information we may provide them with is your name and dob in order to meet business and legal requirements;

#### Healthcode Online Solutions

We use Healthcode to process the billing for the treatment and care provided to you. We provide your basic information along with relevant details of your medical condition/s and treatment for the purpose of generating bills which are in turn sent to yourself or insurance companies.

#### Clare Wilkins Medical Secretary

We use Clare Wilkins to be able to carry out the services we offer and she processes personal information on our behalf when booking in appointments and operations and carrying out the required administrative processes in order to be able to carry out our services. These may include for example arranging for blood tests and scans.



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# Safeguarding Measures

Sains Surgical Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: encryptions, restricted access, IT authentication, firewalls, anti-virus/malware.

# Transfers Outside the EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Sains Surgical Ltd does not transfer or store any personal data outside the EU.

# Consequences of Not Providing Your Data

You are not obligated to provide your personal information to Sains Surgical Ltd, however, as this information is required for us to provide you with our services, we will not be able to offer all our services without it.

## Legitimate Interests

As noted in the 'How We Use Your Personal Data' section of this notice, we may occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

## How Long We Keep Your Data

Sains Surgical Ltd only ever retains personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. We use the same retention period of 6 years to keep any other information relating to you that we hold which will relate to your medical condition and history.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

## Special Categories Data

Owing to the products, services or treatments that we offer, Sains Surgical Ltd often needs to process sensitive personal information (known as special category data) about you, to ensure that your receive the most appropriate treatment and healthcare. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through a signature. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.



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#### See example below:

If you consent to us collecting and using your health/medical information for the purposes stated above, please sign below and print your name: -

Signature \_\_\_\_\_

Print Name: \_\_\_\_\_

# Lodging A Complaint

Sains Surgical Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Sains Surgical Ltd Sharan Sains 6<sup>th</sup> Floor Blackfriars House Parsonage, Manchester M3 2JA

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