

#### WDC - Data protection privacy notice for associates

Our practice records include information about our associates. This privacy notice describes the type of personal information that we hold, why we hold it, and what we do with it. Please read this notice carefully and make sure that you understand it.

Information that we collect

We may collect the following information about you:

- Personal details such as your name, date of birth, national insurance number, passport details or information about your right to live and work in the UK, address, telephone number and email address
- Professional details such as your GDC registration and your indemnity insurance. If you provide NHS services, we will need to know your NHS Dental Performer List number
- Financial information including your gross income from providing patient care under private contract and under the NHS (if applicable), the amount you receive after deductions of practising and personal expenses, and your bank details
- Information about your attendance at the practice to provide dental services.
- Details of any issues that are raised or feedback received in connection with the service you provide, information from any clinical audits on your work and records taken from appraisals.
- Issues that you raise with the practice
- Relevant information about your health, including immunisations against hepatitis B and other blood-borne viruses, conditions that might affect your ability to work or that require us to provide support or assistance
- The results of criminal-record regular checks obtained from the Disclosure and Barring Service and Protecting Vulnerable Groups Scheme you are registered for.

Melissa Taylor and Andrew Taylor are responsible as the practice owners for keeping secure the information about you that we hold.

Our data protection officer ensures that the practice complies with data protection requirements to ensure that we collect, use, store and dispose of your information responsibly.

Those who have access to your personal information include the practice owners, practice manager, pay-roll and financial administrators, practice financial advisors and accountant.

How we use your information

We need up-to-date and accurate personal information to:

- Ensure that your associate agreement properly reflects your engagement at the practice and that you and the practice understand and can meet our respective contractual obligations
- Allow us to ensure that you are meeting your obligations under your associate agreement
- Help us to comply with the legal obligations required by HMRC, the GDC, NHS, CQC and other regulators or government bodies.

We will use the contact details provided by you contact you by telephone, email or letter in relation to matters relating to or arising from your work as an associate at the practice.

We process the following payment information electronically: details of your income and how it is calculated.

# Sharing information

Your information is normally used only by the practice and the associate pay administrators but there may be instances where we are asked to share it – for example, by

- HMRC
- With a new or prospective practice owner, if the practice is sold
- NHS bodies, the GDC, NHS, CQC or the Ombudsman.

We will only disclose your information on a need-to-know basis and will limit any information that we share to the minimum necessary.

In certain circumstances or if required by law, we may need to disclose your information to a law enforcement or other government agency, our insurers, indemnity provider, professional association or legal advisers.

### Keeping your information safe

We store your personal information securely on our practice computer system and in a manual filing systems. Your information cannot be accessed by those who do not work at the practice. Only authorised team members have access to your information (on a need-to-know basis). They understand their legal responsibility to maintain confidentiality and follow practice procedures to ensure this.

We take precautions to ensure security of the practice premises, the practice filing systems and computers.

We use high-quality specialist dental software to record and use your personal information safely and effectively. Our computer system has a secure audit trail and we back-up information routinely.

We use cloud computing facilities for storing some of your information. The practice has a rigorous agreement with our provider to ensure that we meet the obligations described in this policy and that we keep your information securely. Information on the server and practice manager computer ONLY is encrypted and backed up. As a consequence no information should be stored on any other computer or mobile device.

We keep your records for 8 years after the end of your time as an associate, or after the conclusion of any proceedings relating to your engagement, whichever is the longer. Information on the dates of your time as an associate at the practice, pay and other financial matters may be kept for longer to allow us to provide references and in case of patient complaints and/or questions from tax authorities.

## Access to your information and other rights

You have a right to access the information that we hold about you and to receive a copy. You should submit your request in writing or by email. We do not usually charge you for copies of your information; if we pass on a charge, we will explain the reasons.

You can also request us to

- Correct any information that you believe is inaccurate or incomplete. If we have disclosed that information to a third party, we will let them know about the change
- Erase information we hold although you should be aware that, for legal reasons, we may be unable to erase information (for example, concerning your associateship with us or in relation to legal claims).

### If you do not agree

If you have any concerns about how we use your information your first port of call is to contact one of our data protection officers, Katherine Kivalu or Mary-Jane Thompson at Wadebridge Dental, 7-8 Park place, Whiterock Road, Wadebridge, Cornwall, PL277EA.

If you do not wish us to use your personal information as described, please discuss the matter with us. If you have any concerns about how we use your information and you do not feel able to discuss it with your dentist or anyone at the practice, you should contact The Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (0303 123 1113 or 01625 545745).