

PRIVACY NOTICE

What is the purpose of this notice?

To describe how we collect and use personal data about you in accordance with the General Data Protection Regulation (GDPR).

Thorntoncure Ltd will be what's known as the "Controller" of the personal data you provide to us.

What we need

Personal information

In providing you with our services, Thorntoncure Ltd may handle your personal information. Personal information is information about you from which you can be identified, such as your name and contact details. Depending on what services you receive from us, this may include sensitive personal information such as medical information.

Confidential and Medical information

The confidentiality of your personal information is of paramount concern to Thorntoncure Ltd and we comply with UK data protection law and all the applicable medical confidentiality guidelines issued by professional bodies such as the General Medical Council and the Nursing and Midwifery Council.

Your confidential medical information will only be disclosed to those involved with your treatment or care, or in accordance with UK law and guidelines from professional bodies, or for the purposes of clinical audit (unless you object). If you receive services from Thorntoncure Ltd and that service transfers to a new provider, we may share your personal and confidential medical information with the new provider.

Information we may hold about you

The information we hold about you may include the following:

- basic details such as name, address, contact details and next of kin
- details of contact we have had with you such as referrals and quotes
- details of services you have received
- patient experience and feedback outcome information you provide
- information about complaints and incidents
- notes and reports about your health and care you have received or need, including about clinic and hospital visits and medicines administered
- information from customer surveys, competitions and marketing activities
- other information we receive from other sources, including from your use of websites and other digital platforms we operate or the other services we provide, information from business partners, advertising networks, analytics

providers, or information provided by other companies who have obtained your permission to share information about you.

Why we need it

We need to know your basic personal data in order to provide goods and services to you, We will not collect any personal data from you we do not need to provide and oversee this service to you.

What we do with it

We only ever use your personal data with your consent, or where it is necessary:

- to enter into, or perform, a contract with you
- to comply with a legal duty
- to protect your vital interests
- for our own (or a third party's) lawful interests, provided your rights don't override these.

In any event, we'll only use your information for the purpose or purposes it was collected for (or for closely related purposes).

We may process personal information for certain legitimate business purposes, which include some or all of the following:

- where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers
- to identify and prevent fraud
- to enhance the security of our network and information systems
- to better understand how people interact with our websites
- to provide postal communications which we think will be of interest to you
- to determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we always keep your personal data rights in high regard and take account of these rights at all times.

When we process your personal data for our legitimate interests, we will make sure that we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests - we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You have the right to object to this processing. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

Where we keep it

We are based in the UK and we store our data within the EU. Some organisations which provide services to us may transfer personal data outside of the EU, but we will only allow them to do if your data is adequately protected.

For example, some of our systems use Microsoft products. As a US company, it may be that using their products result in personal data being transferred to or accessible from the US. However, we will allow this as we are certain personal data will still be adequately protected (as Microsoft is certified under the USA's Privacy Shield scheme).

How long we keep it

We will only use and store information for so long as it is required for the purposes it was collected for. How long information will be stored depends on the information in question and what it is being used for. For example, if you ask us not to send you marketing e-mails, we will stop storing your e-mails for marketing purposes (though we'll keep a record of your preference not to be e-mailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information. We will not retain your data for any longer than necessary and the longest time that we will hold your data will be six years.

What are your rights?

We want to ensure that you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to confirmation as to whether we have your personal data and, if we do, to obtain a copy of the personal information we hold (this is known as a data subject access request)
- the right to have your data erased (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- the right to have inaccurate data rectified
- the right to object to your data being used for marketing or profiling; and
- where technically feasible, you have the right to personal data you have provided to us which we process automatically based on your consent or the performance of a contract. This information will be provided in a common electronic format.

Please keep in mind that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you wish to raise a complaint on how we have handled your personal data, you can contact Mrs Lindsay Wylie or Mr Derek Wylie who will investigate the matter.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office, the UK supervisory authority for data protection issues.