

## Response Physiotherapy Privacy Notice

Response Physiotherapy is committed to protecting and respecting your privacy.

The purpose of this privacy notice is to;

- Make you aware of how we collect, use, store and disclose personal data collected from you and held about you.
- Make you aware of your rights in relation to that data.

For the purpose of Data Protection Laws, the data controller is Response Physiotherapy Ltd (referred to as 'we', 'us' or 'our').

Contact details for Response Physiotherapy Ltd

Address: Embankment, 50-60 Wilford Lane, West Bridgford, Nottingham NG2 7SD

Phone number: 0115 8969550

Email address: [consent@responsephysio.com](mailto:consent@responsephysio.com)

Company Registration number: 05368983

### 1. The data we collect about you

In most cases employees of Response Physiotherapy will be the 'data processors', who collect, store, transfer and destroy the data, in line with appropriate guidelines or individual's expressed wishes (where applicable).

#### The data we collect about you may include:

- Information that you give us when you enquire by phone, email or digital platforms, when you become a customer or apply for a job. This may include name, address, date of birth, contact details, phone numbers and email address.
- Medical case notes and reports about your care and treatment with us. This may include details of clinic and hospital visits.
- Financial and transaction data such as credit/debit card information you give us when making payments for services and making purchases.
- Information from feedback, complaints and incidents.
- Marketing and communications data which may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.
- Information received from other sources including use of websites and digital platforms we operate.

**We may also collect personal data from third parties**

- We may be passed your personal data by insurance providers or other agencies with whom you have commenced a claim for medical treatment.
- We may be passed your personal data as a referral from the NHS for whom we provide physiotherapy services.

**2. How will my personal data be used?**

**We may use your personal data to:**

- Carry out our obligations to you relating to the provision of treatments or services and contracts related to these. This includes billing, accounting, card verification and anti-fraud screening.
- Check the accuracy of information about you.
- Support other healthcare professionals associated with your care.
- Provide you with information about services and products which might interest you. We will only provide this if you have consented to receive marketing from us by post or electronic means.
- Notify you about changes to services and products.
- Allow you to participate in interactive features of our services when you choose to do so.

**3. Our legal basis for collecting data**

**The most usual legal uses of your personal data are:**

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we are processing sensitive personal data for the purposes of medical treatment being undertaken by health professionals. This may include assessing your working capacity.

**4. Who we share your data with**

**It may be necessary to disclose certain aspects of your personal data to chosen third party organisations including;**

- Any organisation that provides us with IT systems and support including those that may be used to host the systems on which we manage and store your data.
- Organisations used for the purposes of debt collection.
- Logistics organisations used to deliver items to you.
- Providers of secure document storage and/or confidential destruction.
- Marketing companies (subject to obtaining your consent) for the purpose of sending marketing emails.

We ensure that where any third party is involved by us in processing your data, they are contractually obliged to operate in a manner to maintain its confidentiality and security, in addition to their obligations under Data Protection Laws.

**Sensitive personal data may be shared with certain third parties involved in your treatment or care including;**

- Any person or organisation that may be responsible for meeting your treatment expenses or their agents.
- If you raise a complaint or claim we may be required to share personal data with your medical insurer or solicitor for the purposes of investigating the complaint/claim.
- Where practitioners believe it is advisable, information relating to your treatment may be shared with your GP or medical Consultant. If you do not wish us to share your details with other health professionals, we will respect your request if we are legally permitted to do so. However, we advise against this as it could be potentially dangerous and/or detrimental to your health.
- If you are referred to us for treatment by the NHS, we will share the details of your treatment with the part of the NHS that referred you to us.
- For the purposes of clinical audit, we may share your details with external service providers and regulatory bodies.

## **5. How long we store your data**

We retain your personal information for as long as necessary to comply with mandatory healthcare legal obligations.

We will keep basic information about you for a minimum of seven years after you cease being a customer.

## **6. Data security**

All information you provide to us is stored securely. We take security measures to prevent your personal data from being lost, used or accessed in an unauthorised manner. Access is limited to employees, agents, contractors and other third parties who have a business need to know such data.

At your request, we may occasionally transfer personal information to you via email, or you may choose to transfer information to us via email. Email is not a secure method of information transmission. If you choose to send or receive such information via email, you do so at your own risk.

## 7. Your legal rights

The law gives you certain rights in respect of the personal data we hold about you. These include the right to;

- Request access to your personal data.
- Request correction of your personal data if it is factually inaccurate. This right does not extend to matters of opinion, such as medical diagnoses.
- Change your marketing and communication preferences.  
If you opt out of text or email reminders, you will automatically be charged for any DNAs as per our Late Cancellation and DNA Policy on our website.
- Request that the processing of your personal data is restricted (e.g. marketing preferences).
- Request transfer of your personal data.
- Withdraw consent to hold your personal data (after the mandatory 7 year period).

It is particularly important that you inform us about the change of any personal data such as postal address, email address or phone numbers

If you wish to exercise your rights to any of the above please email us on [consent@responsephysio.com](mailto:consent@responsephysio.com) (further contact details above).

### **Access to your personal data and medical notes**

You will not be charged a fee to exercise any of your legal rights or to access your personal data. However, we reserve the right to charge a fee if your request is clearly unfounded or excessive. In these circumstances we may refuse to fulfil your request.

In the interest of security, to confirm your identity and so your personal data is released correctly, we may need to request further, specific information about you.

## 8. How to raise a complaint

If you have a complaint regarding the collection and use of your data, we ask that you contact us initially so that it can be resolved. You have the right to complain to the Information Commissioner's Office (ICO).

For more information and advice on data protection, see [www.ico.org.uk](http://www.ico.org.uk)

## Declaration of Consent

### Data

I have read and understand the Response Physiotherapy Privacy Notice and am in agreement to the holding and processing of my personal data as detailed in the Privacy Notice (available on web site & in clinic).

### Treatment

I consent to receive treatment, including acupuncture, from Response Physiotherapy Group Ltd and its subsidiary companies.

Prior to giving my consent for acupuncture, I will be given full opportunity to discuss what is involved with the clinician.

### Communication

I understand that I will be sent appointment reminders via text or email where I have provided these details.

### Payment for my treatment

I agree that where my treatment is being funded by a third party (e.g. private health insurer or other 3<sup>rd</sup> party) that Response Physiotherapy will seek payment from that third party. If payment is not made against all or part of the treatment given, I understand that I will be liable for the outstanding balance and agree Response Physiotherapy will seek payment from me.

### Marketing Preferences

I agree to receive communications about offers and promotions sent by email, text or post.

Please tick if you want to be excluded from marketing preferences

## Signed Consent

Patient name	
Address	
Date of birth	
Email address	
Mobile number	
Patient Signature	
Date	

## Consent to treat under age of 16

Parent/Carer name (under 16s only)	
I am the parent/lawful carer of the person named above. I consent to treatment and contact as detailed above	
Parent/carers Signature	

Please print, sign and email scanned copy to [consent@responsephyiso.com](mailto:consent@responsephyiso.com)