

Foxholt Clinic For Complementary Health - Privacy Policy

01 In the course of initial consultations and subsequent appointments, I ask a lot of
questions and gather a lot of information. The more I know about a patient, the
05 better I can diagnose and treat them. But the information I ask about is medical -
the most private and sensitive of information.

I only ask questions that could reveal information that is important to your diagnosis
or treatment. Until I've asked, I can't know whether the answer will be relevant. So I
need patients to answer as honestly as they can, and patients have to be confident
that any information they reveal in their answers will be private and secure. So I
10 take their privacy and data security very seriously.

I have a detailed Privacy Policy below, but I also want to be as clear and
unequivocal as possible. So I've boiled Foxholt Clinic's Privacy Policy down to a
few simple promises:

- 15 1. Apart from the information necessary for using the online booking system, no
information is kept online. [More detail]
2. I will not retain all the information you provide but only the information that is
either relevant, or that I am legally required to keep. [More detail]
- 20 3. I will only retain information for as long as I am legally required to keep it.
[More detail]
4. At the end of that legally required period, I will try to contact you and let you
know I'm about to erase the information, in case you'd like a copy before I do.
[More detail]
- 25 5. I will not share, sell, exchange, or otherwise give your information to anyone at
all, at any time, except in two specific circumstances:
 - i. If I have a signed consent form from you asking me to do so. [More detail]
 - 30 ii. If I am legally compelled to provide your information. Even then, I will redact
your information to provide the bare minimum I am forced to give. I will tell
you if I am compelled to provide your information in this way. [More detail]

45 So, here is the more detailed Privacy Policy, giving more detail about the promises above, and other information that is important for you to know:

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50 This version updated 20/May/2024

In the event of any variation between the online and downloadable text, the online version is definitive.

Contact Details

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Name:

Oliver Vass

Address:

The Foxholt Clinic For Complementary Health

60 Chesham and Ley Hill Golf Club

Middle Road

Ley Hill, Chesham

Bucks HP5 1UZ

Phone Number:

65 07595 038400

E-mail:

Oliver@oliver-vass.com

The Types Of Personal Data Foxholt Clinic Collects (Number 2 Above)

70 Foxholt Clinic collects two distinct types of data:

1. Personal and Contact details including: Name; Date Of Birth; Telephone Number; Email Address; your appointment times.

75 2. Information from your medical history that is relevant to your reason for visiting the clinic, and that may affect your diagnosis and/or treatment. That may include: Your current symptoms; Your history of symptoms; Relevant physical systems information (blood pressure, breathing, digestion, physiology); Relevant anatomical presentation; Functional information; Any medications you are taking; Surgical history;

80 The first type of data will either be input into the online booking system by you, if you booked your first appointment that way. Or I will ask for that information when I book you in the first time. I'll confirm this information at your first appointment.

85 These data are used for communicating important information relevant to your appointments and internal changes at the Foxholt Clinic that may impact your care. These are the only data kept online.

90 The second type of data is gathered during appointments by the asking of questions. At each appointment additional questions will be asked and more information

91 added to your notes. This information is used to benefit you, by improving your
diagnosis, and so improving the specificity of your treatment. Of all the information
gathered I only record the information I am either legally required to keep or that is
95 relevant, something I will only know by asking the questions. If there is a piece of
information you would rather I don't record, please let me know.

These data are kept offline: on a clinic device and on a secure backup. On the
occasions a new clinic device or a new back up device replaces a previous one, the
device being replaced will have all your data securely erased.

100 Foxholt Clinic does not collect data indirectly, or record any data received
incidentally without first asking you.

Retention Of The Information Foxholt Clinic Collects (Number 3 Above)

105 Under the General Data Protection Regulation (2018) Foxholt Clinic is legally
required to retain this information for seven years from the date of your last
appointment (or if you were under 18 years of age at the time of your last
100 appointment, then until seven years after your 18th birthday). In the event of
Foxholt ceasing to exist, the owner Oliver Vass will become responsible for
managing the information. Should this happen you will be informed of the transfer
of responsibilities, and how to contact me.

What Happens To Information After Seven Years (Number 4 Above)

115 After seven years all your information will be securely deleted. A month before
deletion, Foxholt Clinic will make all reasonable efforts to contact you to let you
know your information is due for deletion, and the date it will take place. Foxholt
120 Clinic will also attempt to contact you immediately before deletion to confirm it
will happen that day.

Foxholt Clinic will not contact you after deletion.

125 When Foxholt contacts you to inform you it will be deleting your information, you
will be asked if you would like a copy of your notes. After deletion that opportunity
will no longer exist. Secure deletion is final. Your information will no longer exist,
so Foxholt will be unable to access it for any reason.

Who Will Have Access To Your Information (Number 5 Above)

130 Your personal and contact details can be accessed by Oliver Vass and appointed
clinic staff for the purpose of contacting you in case of any changes you need to
know about. No one is permitted to copy your information or to use it for any
135 purpose other than contacting you for the reasons above, or to pursue your request
when you contact the clinic.

138 Foxholt Clinic will not share, sell, exchange, or otherwise give your information to
anyone at all, at any time, except in two specific circumstances.

- 140 i. If I have a signed consent form from you asking me to do so.
ii. If I am legally compelled to provide your information. Even then, I will redact
your information to provide the bare minimum I am forced to give. I will tell
you if I am compelled to provide your information in this way.

145 Your Data Protection Rights

Under The General Data Protection Regulation (2018), and before that the
Data Protection Act (1998), you have rights including:

150 **A Right Of Access**

You have the right to ask us for copies of your personal information at any time. This
is called a Subject Access Request, 'SAR'. Although Foxholt Clinic will legally have
up to a calendar month to deliver your data, you can expect me to prioritise
155 fulfilling your request without any unnecessary delay.

A Right Of Rectification

You have the right to ask us to rectify personal information you think is inaccurate.
You also have the right to ask us to complete information you think is incomplete.

160 **A Right To Restriction Of Processing**

You have the right to ask us to restrict the processing of your personal information.
In other words, although Foxholt Clinic will still have a legal obligation to retain
your data for seven years after your last appointment, you can request the clinic
does not process that data in a specific way, for example, that it doesn't contact you
165 any longer with important information not directly related to your appointment. The
Clinic must comply with that request.

A Right To Object To Processing

170 You have the right to object to the processing of your personal information in any
capacity. In other words, although Foxholt Clinic will still have a legal obligation to
retain your data for seven years after your last appointment, you can request the
clinic does not process that data in any way. Please note, this would prevent the
Clinic contacting you prior to deletion as stated above.

175 **A Right To Data Portability**

You have the right to ask the Clinic to provide a copy of the personal information
we hold to another organisation, or to you.

180 You are not required to pay any charge for exercising any of your Data protection
rights. If you make a request, we have one month to respond to you, but The Clinic
aspires to a swifter resolution.

Please contact me at oliver@oliver-vass.com if you wish to make a request.

185 Please also see the Information Commissioner's Office information.
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

How To Complain

190 I (Oliver Vass) take your privacy very seriously.

195 If you feel this Privacy Policy (which goes well beyond the legal requirements) does not meet the legal standard in some aspect, or if you feel it can be improved, or if you have any concerns about our use of your personal information, or that I haven't met the standard laid out in this Privacy Policy, Please bring it to my attention so I can rectify the problem as a matter of urgency.

200 If you prefer you can make a complaint to us at the Foxholt Clinic's usual email address, which I will report to the Information Commissioner.

205 You can complain directly to the ICO if you are unhappy with how we have used your data or you are unhappy with the outcome of your complaint to Foxholt. We will provide you with any copies of our communications with them.

The ICO's address:

210 Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

214 Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>