

## GENERAL DATA PROTECTION REGULATION POLICY

### Policy statement

#### Business

City Health Clinic (CHC) provides a range of dental and medical services from its premises at 9 Earl Grey Street, to private individuals and to persons employed by, licensed by, or introduced by companies or other private or public bodies (referred to as 'patients'). These services are carried out by qualified self-employed clinicians, supported by CHC employees.

CHC is committed to ensuring that it complies with GDPR and applies the highest ethical principles to all aspects of its work to protect the interests of employees, clinicians and patients and to maintain the confidentiality, accuracy and security of all personal data held in any form by the clinic.

CHC 's processes and procedures are aligned with the six key principles set out in Article 5 of the GDPR which are summarised as follows:

Personal Data should be -

- Fairly and lawfully processed in a transparent manner
- Collected only for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept in an identifiable form for no longer than is necessary
- Processed in a manner which ensures adequate security

Under the GDPR definitions, CHC is both a controller and processor of personal data.

#### Personal Data

In order to carry out these services in accordance with regulations and guidance set by various dental, medical and health authorities, personal data is collected and processed from all patients, generally under the lawful basis of consent. Special category data may also be processed under the explicit consent of the patient.

Patients are provided with the appropriate privacy information when we collect their personal data. This data is verified and updated on each subsequent appointment with the clinician.

Personal data collected in respect of clinicians and employees is processed under the lawful basis of Contract and Legal obligation

CHC respects the individual's rights regarding personal data.

## Data Protection

CHC takes responsibility for complying with GDPR at the highest management level and throughout the organisation. CHC has implemented and maintains appropriate technical, security and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to personal data.

CHC has established data protection policies which are regularly reviewed and incorporated in our training agenda for all employees. All processes are fully documented, and records kept of all consents and any personal data breaches.

Electronic personal data is stored on proprietary equipment maintained by professionally qualified contractors, who also provide regularly updated cyber-security measures to protect against unauthorised access or corruption. All access to data is password protected, and all those authorised to access data are subject to confidentiality agreements. Data is backed up off-site on a daily basis.

Access to our hardware and software systems for repair and maintenance purposes is only provided to suitably qualified and GDPR compliant firms.

All paper-based data is stored in secure, locked, fire-resistant cabinets with restricted access.

Personal data is retained for periods in line with recommendations set by the relevant dental, medical, health or other authority.

Policy date: 4<sup>th</sup> May 2018

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Signed:

Position: Practice Manager

Date: 4<sup>th</sup> May 2018

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