

WEBSITE PRIVACY POLICY

1.0 OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

- > User privacy and data protection are human rights
- > We have a duty of care to the people within our data
- > Data is a liability, it should only be collected and processed when absolutely necessary
- > We loathe spam as much as you do!
- > We will never sell, rent or otherwise distribute or make public your personal information

2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1966 \(CDPA\)](#)
- [EU Data Protection Directive 1995 \(CDPD\)](#)
- [EU General Data Protection Regulation 2016 \(GDPR\)](#)

This website complies with all of the above legislation and by visiting this website you are agreeing to the terms of its use in compliance with EU regulation data regulation laws. If you are a visitor outside of the EU, you may wish to check with your resident's countries and territories legislation data protection regulation before proceeding to view our website services.

3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. While IP addresses, which are recorded by GA, can sometimes be used to personally identify you, we have added an additional layer of protection by implementing a system of IP anonymisation with GA. We consider Google to be a third-party data processor (see section 6.0 below).

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GA makes use of cookies, details of which can be found on [Google's developer guides](#).

Our policy is that cookies data collected by GA will be retained for a period of 50 months after which point GA will delete the data. Should you visit our website in the intervening period, the "clock" will reset for a further 50 months

Disabling cookies via the options menu on your internet browser will stop GA from tracking any part of your visit to pages within this website. You can also delete any cookies that are already stored on your computer's hard drive.

To find out more about cookies, including seeing what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

If you do not wish to accept cookies from our website, please leave this site immediately and then delete and block all cookies from this site.

3.2 Website contact form

Should you choose to submit an enquiry via our contact form including a request for an appointment, the name, address, contact number and email address you enter with your enquiry details will be saved to this website's database, along with your computer's IP address and the time and date that you submitted the comment. This information is only used to identify you for the purposes of handling your enquiry. It is not passed on to any third-party parties. None of these details will be shown on the public-facing website. See section 4.0 below for further details.

If you are under 16 years of age you **MUST** obtain parental consent before contacting us via the contact form.

3.3 Online appointment booking

Should you choose to book your appointment via our 24/7 online booking button, you will be redirected to a City Health Clinic booking page hosted by a third party data processor – Software for Excellence. Should you complete an appointment booking, your name, date of birth, sex, phone number and email address you enter along with additional information which you provide, will be saved securely within City Health Clinic's records on the Software for Excellence platform, along with your computer's IP address and the time and date that you completed the booking. This information is used to identify you and to provide basic information ahead of your scheduled appointment. It is not passed on to any third-party parties. See section 6.0 below for further details of our third-party data processors

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and their own policies on managing data.

If you are under 16 years of age you **MUST** obtain parental consent before using the 24/7 online booking button.

4.0 HOW WE STORE YOUR PERSONAL INFORMATION

4.1 Personal information submitted online

As detailed in section 3.2 above, if you submit an enquiry or an appointment request via this website, some personal information will be stored within this website's database. This is currently the only occasion where personal data will be stored on this website

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

In the meantime, we will periodically delete this data from the website's database (at least every 90 days). Should you wish to have any personal identifiable information contained with our website's database removed more quickly, please email us here at: yovanne.louden@cityhealthclinic.com using the email address that you used when submitting your enquiry or appointment request.

4.2 Personal information held about patients

We keep medical records and treatment records for all patients of City Health Clinic in order that we can provide you with the medical, dental or facial aesthetic services which you have requested from us.

We hold the following personal information about you:

Your name, address, post code, date of birth, contact details (home and /or work telephone number, home and / or work email address), clinical treatment records, appointment attendance records, financial records relating to treatment and / or services billed for, referral letters, consent to treatment and treatment estimates and other communications for administration purposes.

This information is required to provide you with dental and medical services and treatments, appointments, recalled attendance, referrals to be made when required and for billing purposes.

Occasionally we will share your information with another health care provider, if this is required we will obtain your agreement and signed consent before any

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referral is made.

If your employer has a service agreement in place with City Health Clinic as their designated healthcare provider for health screening or occupational health services, we will share agreed information with your employer only with your agreement and consent.

Please refer to our attached policies: GDPR Policy, Data Protection, Confidentiality and Information Security Policy which provide detail on the type of information we store, why this information is stored and how long we retain records.

5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by PAC Webhosting Limited data centre located Manchester, England.

Some of the data centre's more notable security features are as follows:

- Proximity access locks on all external and internal doors
- Server cabinets have locked doors (no open racks)
- 24x7 on-site security guards with static and mobile patrols
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All traffic (transferral of files) between this website and your browser is encrypted and delivered over [HTTPS](#).

6.0 OUR THIRD-PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0.

- Google ([Privacy Policy](#))
- Software of Excellence ([Privacy Policy](#))

7 DATA ASSOCIATED WITH ONLINE ADVERTISING

From time to time, we use third-party service providers (Facebook and Google) to serve ads on our behalf across the internet. They may collect anonymous information about your visits to our website, and your interaction with our products and services. They may also use information about your visits to this and

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other website to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is industry standard technology used by most major websites. No personally identifiable information is collected or used in this process. They do not know the name, phone number, address, email address, or any personally identifying information about the user. If you would like more information about this practice and to know your choices about not having this anonymous information used by our third-party service provider, please visit our third party service provider's websites.

www.facebook.com/

www.google.com/

You can also read more about online marketing practices and the technologies that support them by visiting the [Your Online Choices](#).

We may also, from time to time, appoint third parties to act as our agents in setting up and monitoring this type of online advertising. These third parties do not have access to any personally identifiable information about the user.

8.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third-party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

9.0 DATA CONTROLLER

The data controller of this website is: CITY HEALTH CLINIC LIMITED, a UK Private Limited Company with company number: SC291823

Whose registered office is:

16 Charlotte Square
Edinburgh EH2 4DF

10.0 DATA PROTECTION OFFICER

Yvonne Loudon, Practice Manager
City Health Clinic, Princes Exchange, 9 Earl Grey Street, Edinburgh EH3 9BN
T: 0131 228 2442
E: yvonne.loudon@cityhealthclinic.com

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11.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the change log below.

11.1 Change log

25/05/2018 - version 1.0

- Updated privacy policy instigated