# Milltown Physiotherapy

# **Data Privacy Notice**

At Milltown Physiotherapy Ltd., your privacy is of paramount importance to us. We have obligations to you both under the General Data Protection Regulation (GDPR), and under legal and ethical regulations pertaining to the professional body of physiotherapy, The Irish Society of Chartered Physiotherapists. The GDPR will come into effect on 25 May 2018, and from that date will supersede existing law and place enhanced accountability and transparency obligations on organisations when using your information. The GDPR will also introduce changes which will give you greater control of your personal information, including a right to object to processing of your personal information where processing is carried out for business purposes.

This summary explains most important aspect of how we use your information and what rights you have in relation to your personal information. Existing or potential patients or clients of the practice are welcome to discuss any queries they may have in relation to our policy, at any stage.

# **Summary of Policy**

### 1. Who we are

Throughout this notice, "we", "us", "our" and "ours" refers to Milltown Physiotherapy Ltd.. Your information is held by this company. All of the businesses with whom we deal have their own Data Privacy Notices, and all external contractors and employees sign a data protection/non-disclosure agreement in advance to being granted any access to the data we hold.

## 2. The information we collect about you

We will hold:

- data to identify you, including your contact information;
- data relating to your general practitioner and/ or other healthcare professionals, with whom we share your care;
- data relating to your health history and other information disclosed during the course of consultations:
- data relating to treatments/ procedures discussed or carried out;
- data related to products and services purchased;
- data related to medical devices used during your care (e.g Ultrasound, Radial Shock wave)

## 3. When we collect your information

We collect information: (i) you give us (ii) communicated to us by other parties involved in your care

### 4. How we use your information and the legal basis

We use and share, your data where:

- you have explicitly consented to the using of your data in a specific way (you may withdraw your consent at any time) (e.g. patient questionnaires).
- use is necessary in relation to a service or treatment provided to you, or because you
  have asked us to provide a service or treatment (e.g. referring you on for a medical /
  surgical opinion or communicating with your GP)
- use for our legitimate interests (which you may object to) such as managing our business including risk management, providing service information, conducting training and quality assurance, and strategic planning;
- we are legally obliged to do so.

### 5. Who we share your information with

When providing our services to you, we may share your information with:

- your general practitioner
- healthcare professionals and medical consultants;
- administrative staff at Milltown Physiotherapy or other healthcare facilities where you may receive care
- our IT contractors;
- our financial consultant/ accountant;
- representatives/ suppliers of products or devices used in your care.

# 6. How long we hold your data

Your data will be retained for as long as is deemed necessary for good medical record keeping. Typically, data will be retained for a minimum of seven years.

## 7. Implications of not providing your data

If you do not provide information we may not be able to:

- accept you as a patient/ client of the practice;
- provide requested treatments, procedures, or products to you;

We will tell you when we ask for information which is not a contractual requirement or is not needed to comply with our legal and ethical obligations.

# 8. Using companies to process your information outside the European Economic Area (EEA)

At the present time, we do not deal with any service provider organisation outside the EEA. Should we at some point in the future do so, (which is unlikely) we will always take steps to ensure that any transfer of information outside the EEA is carefully managed to protect your privacy rights.

# 9. How to exercise your information rights including the right to object

From 25th of May 2018, you will have several enhanced rights in relation to how we use your information, including the right, without undue delay, to:

- find out if we use your information, access your information and receive copies of your information:
- have inaccurate/ incomplete information corrected and updated;
- object to particular use of your personal data for a legitimate business interests or direct marketing purposes;
- in certain circumstances, to have your information deleted or our use of your data restricted (please note that we have certain legal and ethical obligations which preclude deletion of medical health records)

### 10. How to contact us

If you wish to exercise any of your data rights, you can contact us at <a href="mailtownphysiotherapy.com">info@milltownphysiotherapy.com</a>, or Milltown Physiotherapy, 98 Lower Churchtown Road, D14 T8P9, by telephone +3532960603.

If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests) we may extend this period by a further two calendar months and shall

explain the reason why. If you make the request electronically, we will try to provide you with the relevant information electronically.

You also have the right to complain to the data protection commission or another supervisory authority. You can contact the office of the Data Protection Commissioner at:

Telephone: +3537611048000 or LoCall Number 1890252231

Fax: +353578684757

email: info@dataprotection.ie

Postal address: Data Protection Commission, Canal House, Station Road, Portarlington,

R32AP23, Co. Laois

### 11. Updates

We will update our Data Privacy notice from time to time. Any updates will be made available online and in our office. This current version of the notice was published on 25<sup>th</sup> May 2018.

Your privacy is of paramount importance to us. Please be assured that we will never share your data with any third party, or add you to any mailing list, without your express consent. Any information you provide is accessible only to the professional staff at Milltown Physiotherapy and is subject to the rules governing physiotherapist-patient confidentiality. While we have taken appropriate measures, as with any website, security cannot be absolutely guaranteed, and therefore we advise against including any highly sensitive material on forms submitted via this website.

# Notice in relation to website

#### Milltown Physiotherapy Ltd. website (www.milltownphysiotherapy.com)

This statement relates to our privacy practices in connection with this website. We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identifiable as such.

#### General statement

We fully respect your right to privacy, and will not collect any personal information about you on this website without your clear permission. Any personal information which you volunteer to us will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts, 1988 & 2003, and GDPR 2018. In addition, any information provided within the context of the physiotherapist-patient relationship is subject to the confidentiality rules of the Irish Society of Chartered Physiotherapists.

#### Collection and use of personal information

We do not collect any personal data about you on this website, apart from information which you volunteer (for example by filling out an online application form). Any information which you

provide in this way is not made available to any third parties and is used by Milltown Physiotherapy Ltd. only in line with the purpose for which you provided it.

### Requests regarding data supplied via this website

On request, we will supply copies of your personal data to you. If you wish to obtain such copies, you must write to at the address below or email <a href="mailto:info@milltownphysiotherapy.com">info@milltownphysiotherapy.com</a>. You should include any personal identifiers which you supplied earlier via the website (e.g. Name; address; phone number; e-mail address). Your request is free of charge, will be dealt with as soon as possible and will take not more than 40 days to process.

If you discover that this office holds inaccurate information about you, you can request that we correct that information. Such a request must be in writing or via e-mail. In certain circumstance you may also request that data which you have supplied via the website be deleted.

### Complaints about data processed via the website

If you are concerned about how personal data is processed via this website, please do not hesitate to bring such concerns to the attention of Maeve Whelan or Helen MacDevitt at the contact details below.

Technical details in connection with visits to this website are logged by our internet service provider for our statistical purposes. No information is collected that could be used by us to identify website visitors. The technical details logged are confined to the following items:

- the IP address of the visitor's web server.
- the top-level domain name used (for example .ie, .com, .org, .net).
- the previous website address from which the visitor reached us, including any search terms used.
- clickstream data which shows the traffic of visitors around this web site (for example pages accessed and documents downloaded).
- the type of web browser used by the website visitor.

No attempt by any staff member will be made to identify individual visitors, or to associate the technical details listed above with any individual. It is the policy of Milltown Physiotherapy Ltd. never to disclose such technical information in respect of individual website visitors to any third party (apart from our internet service provider, which records such data on our behalf and which is bound by confidentiality provisions in this regard), unless obliged to disclose such information by a rule of law. The technical information will be used solely by Milltown Physiotherapy Ltd. and only for statistical and other administrative purposes.

For any further information, please contact

info@milltownphysiotherapy.com,

Milltown Physiotherapy, 98 Lower Churchtown Road, D14 T8P9, Telephone +3532960603.

Updated 24th May 2018