



This Privacy Policy describes how and when Bebington Podiatry collect, use, and share information when you attend an appointment at my clinic, purchase a product from me, contact me, or otherwise use my services. This is to comply with the General Data Protection Regulations (GDPR) 2018.

Information I Collect

To aid your treatment or as part of purchasing something from Bebington Podiatry you will normally provide us with certain information, such as your name, email address (optional), postal address, medical information and payment information. Bebington Podiatry will store your information on a written patient record and diary system and a computer database which is fully password protected.

Why I Need Your Information and How I Use It

Bebington Podiatry rely on a number of legal bases to collect, use, and share your information, including:

- where it is necessary for the purposes of the provision of health care as needed to provide podiatry services, such as when our podiatrists use your information to fulfil your podiatry assessment and treatment, or to provide customer support;
- when you have provided your affirmative consent, which you may revoke at any time, for treatment by our podiatrists or being added to our database.
- if necessary to comply with a legal obligation or court order or in connection with a legal claim, such as retaining information about your purchases if required by tax law;

Marketing (optional)

From time to time I may wish to send you direct marketing material which may include
product offers and newsletters. If you are happy for me to do this please indicate in
what forms you would like to receive this information:

Information Sharing and Disclosure

Mail ☐ Email ☐ Text ☐ Phone ☐ No Marketing ☐

Information about Bebington Podiatrys' patients/customers is important to our business. Bebington Podiatry would share your personal information for very limited reasons and in limited circumstances, as follows:

- Medical professionals. With your consent Bebington Podiatry will share information with medical professionals such as your GP or consultant to allow continuity of care, for example, if you presented with an infection which requires antibiotics etc.
- Service providers. Bebington Podiatry engage certain trusted third parties to perform functions and provide services to my business, such as internal reception services. Bebington Podiatry will share your personal information with these third parties, but only to the extent necessary to perform these services.





- Business transfers. If Bebington Podiatry is sold or merged, I may disclose your information as part of that transaction, only to the extent permitted by law and with your consent.
- Compliance with laws. Bebington Podiatry may collect, use, retain, and share your information if legally required to.

Data Retention

Bebington Podiatry retain your personal information only for as long as necessary to provide you with podiatry services and as described in our Privacy Policy. However, Bebington Podiatry may also be required to retain this information to comply with my legal and regulatory obligations, to resolve disputes, and to enforce my agreements. The retention of podiatry records is normally a minimum of 8 years after the last appointment or for minors, 8 years after the last appointments from when they reach the age of eighteen. For customers who are not patients but may have bought products from Bebington Podiatry, we will keep any data you may have provided for a minimum of 6 years in line with tax legislation.

Transfers of Personal Information Outside the EU

I may store and process your information through third-party hosting services in the US and other jurisdictions. As a result, I may transfer your personal information to a jurisdiction with different data protection and government surveillance laws than your jurisdiction. If I am deemed to transfer information about you outside of the EU, I rely on Privacy Shield as the legal basis for the transfer, as X Cloud is Privacy Shield certified.

Your Rights

You have a number of rights in relation to your personal information. While some of these rights apply generally, certain rights apply only in certain limited cases. Bebington Podiatry describe these rights below:

- Access. You have the right to access and receive a copy of the personal information held about you by contacting Bebington Podiatry using the contact information below.
- Change, restrict, delete. You may also have rights to change, restrict the use of, or delete your personal information. In the case of health records these are normally exempt from change and deletion requests.
- Object. You can object to (i) processing of some of your information based on Bebington Podiatrys' legitimate interests and (ii) receiving marketing messages from Bebington Podiatry after providing your express consent to receive them. In such cases, Bebington Podiatry will delete your personal information unless there are compelling and legitimate grounds to continue using that information or if it is needed for legal reasons.
- Complain. If you wish to raise a concern about my use of your information (and without prejudice to any other rights you may have), you have the right to do so with the Information Commissioner www.ico.org.uk

How to Contact Me

Professional Practice Committee: How to write a privacy policy 2018 v1





For purposes of the GDPR, I, Ann James, am the data controller of your personal information. If you have any questions or concerns, you may contact me:

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annjames.	hahhad	htintorn	0+ 00 m

Alternately, you may mail me at:

Bebington Podiatry

270 Heath Road

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CH63 2HQ