

# **Privacy Policy**

Walcote Health Ltd ("We") are committed to protecting and respecting your privacy.

This policy (and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act, the data controller is Walcote Health Ltd with registered address at: Southgate Chambers, 37-39 Southgate Street, Winchester, Hampshire, SO23 9EH, registered in England Number 08929724.

Walcote Health Ltd understands that your information is entrusted to us and we are committed to protecting and respecting your privacy. To this end Walcote Health Ltd complies with data protection legislation and with clinical confidentiality guidelines. This privacy policy is designed to tell you about our practices regarding the collection, use, storage and disclosure of personal information that we hold about you and which you may provide when either contacting us for an enquiry or registering with us to use or access our services.

When we refer to "personal information" in this policy, we mean information that could or has the potential to identify you as an individual or provides information about you. Accordingly, we may hold and use information about you as a customer, a patient, or in any other capacity, for example, when you visit our websites, complete a form, access our services or speak to us.

## Security of your personal information

We endeavour to protect all information we hold about you by ensuring that we have appropriate security measures in place to prevent unauthorised access, information being lost, destroyed or damaged.

In the usual course of our business, we may use third party organisations to support the essential delivery of our services. This may be to support IT systems in which your information is stored, or for the purposes of debt collection, transportation and storage of information and confidential destruction.

Where a third party data processor is used, we ensure that they operate under contractual restrictions with regard to confidentiality and security, in addition to their obligations under the Data Protection Act.

Personal information you provide to us is held on a secure server in locked information centres and is encrypted wherever possible. Information is kept for as long as is reasonably necessary.

## Information collected during service enquiries

When you contact us to enquire about a service or a product, we will collect personal information about you to enable us to provide you with the information that you have enquired about. Information collected will be kept securely and only accessed by those individuals responsible for ensuring you are provided with the correct information about our services.

## Telephone calls

In the interests of training and continually improving our services calls to Walcote Health Ltd and its agents may be monitored or recorded.

## Health information collected during treatments and services

Where sensitive clinical information is collected it will be kept confidential and secure and will only be disclosed to and received from those individuals involved with your treatment or care, or to their agents and, if applicable, to any person or organisation who may be responsible for meeting your treatment expenses or their agents. Information may be provided to external service providers and regulatory bodies for the purpose of clinical audit to ensure the highest standards of care and record keeping are maintained.

The highest standards of confidentiality will be applied to your personal data in accordance with data protection law and confidentiality. Any publishing of this data for Walcote Health Ltd's audit or research purposes will be in a coded or anonymised form. Anonymous or aggregated data may be used by Walcote Health Ltd, or disclosed to others, for research or statistical purposes.

#### Information entered onto the Walcote Health Ltd website

Walcote Health Ltd takes a proactive approach to website user privacy and ensures that the necessary steps are taken to protect the privacy of its users throughout their visiting experience. The Walcote Health Ltd website complies to all UK national laws and requirements for user privacy.

Please be sure to read this entire privacy policy before using or submitting information to the Walcote Health Ltd website. The Walcote Health Ltd website is controlled and owned by Walcote Health Ltd referred to in this privacy statement as 'we', 'us' or 'our'.

By using the Walcote Health Ltd website site, you agree to the terms of this Privacy Policy. Whenever you submit information via the site, you consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy. The site is intended for use by residents of the United Kingdom.

## Personal information collected when you access the Walcote Health Ltd website

We may collect and process personal information when you:-

- use our website
- enquire about any of our services or treatments
- register or book to receive any of our services or treatments
- fill in a form (including a registration form)
- · complete feedback forms on our website
- · post material on the site
- participate in a competition or promotion sponsored by us
- if you contact us, we may keep a record of that correspondence.

We may also collect sensitive information related to your health that you have entered into a web form, emailed, emailed via our website or relayed in a telephone call to our staff. Please note that we are unable to guarantee that information sent through a web form enquiry or via email is protected.

## The security and storage of personal information entered via the website

Data transmission over the internet is not completely secure and we cannot guarantee the security of your personal information or other data transmitted to or from our website; any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

By submitting your personal data, and in providing any personal and/or sensitive information to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## Use of personal information provided through our website

Your personal information will be kept confidential and secure and only used in connection with Walcote Health Ltd services for the purpose for which it was collected and in accordance with our requirements under data protection legislation and clinical confidentiality guidelines.

Sensitive information related to your health will only be used to enable our employees to provide you with information and services appropriate to your interests and preferences or to enable contracted service providers to provide you with services relating to our communications with you or in connection with any medical treatment which you may be receiving or seeking advice. Any personal information you provide will be held for as long as is reasonably necessary having regard for the purpose for which it was collected.

We may use your personal data for some or all of the following reasons:

- To provide various Walcote Health Ltd services and to allow you to ensure that content from our site is presented in the most effective manner for you;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between you and us;
- To allow you to participate in interactive features of our service, if appropriate, when you choose to do so;
- To notify you about changes to our service.

# Use of non-personal information collected when accessing the website

Other non-personal information which you submit may be collected to enable us to better understand our customers, improve our website, general marketing and to help provide a better experience of our services. We may also use other companies to set cookies on your website and gather cookie information for us – please refer to the information detailed below. From time to time we may also analyse Internet Protocol (IP) addresses or other anonymous data sources too.

## What are cookies?

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device.

Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience.

They can also help to ensure that adverts you see online are more relevant to you and your interests.

### Use of cookies

The Walcote Health Ltd website uses cookies to improve the user's experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

A cookie is a small file that is automatically sent by an Internet server and which installs itself on the hard disk of the user's computer. Cookies track, save and store information about the user's interactions and usage of the website. Any information held about your use of the website is stored securely.

By using this website, you consent to our use of cookies. This allows the website, through its server, to provide the users with a tailored experience within this website. You are advised that if you wish to deny the use and saving of cookies from this website onto your computer's hard drive, you should take necessary steps within your web browser's security settings to block all cookies from this website

We use cookies to enable you to move around the site or to provide certain basic features; to enhance the functionality of the website by storing your preferences; to help us to improve the performance of our website and to provide you with a better user experience. We do not use individual information for commercial purposes nor do we share this information with any other organisation.

This website uses tracking software to monitor its visitors to better understand how they use it. This software collects and analyses the information automatically to help us improve our site. The software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read <a href="Google's privacy policy here">Google's privacy policy here</a> for further information.

For information on how to delete cookies, please refer to: <a href="http://www.wikihow.com/Clear-Your-Browser's-Cookies">http://www.wikihow.com/Clear-Your-Browser's-Cookies</a>

#### **Contact & communication**

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process but we advise users using such form to email processes that they do so at their own risk.

This website and its owners use any information submitted to provide you with further information about the services they offer or to assist you in answering any questions or queries you may have submitted about the services. This includes using your details to subscribe you to any email newsletter program the website operates but only if this was made clear to you and your express permission was granted when submitting any form to email process. Or whereby you the consumer have previously purchased from or enquired about purchasing from the company a service that the email newsletter relates to. This is by no means an entire list of your user rights in regard to receiving email marketing material.

Your details are not passed on to any third parties.

## **External links**

Although this website only includes external links which the owners believe in good faith to be safe and relevant, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## Social media platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate or engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email to arrange an appointment. For your own medical safety and privacy, please do not include any personal medical information or queries in an email – these will be discussed at the time of the appointment.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

## Marketing

If you have consented to our processing your personal information for marketing purposes we may send you information about Walcote Health Ltd products and services which may be of interest to you.

You have the right to ask us not to process your information in this way at any time. If you no longer wish to receive web based marketing information you can unsubscribe. For non-web based marketing information please write to:

Data Protection Officer Walcote Health Ltd Southgate Chambers 37-39 Southgate Street Winchester Hampshire SO23 9EH

### Third party websites

Our website may contain links to other websites which are outside of our control and are not covered by this privacy policy. If you link to these websites we encourage you to read their own privacy policies which may differ from ours.

### **Fraud**

Information may be disclosed to others with a view to preventing fraud or to assist in police investigations in line with the Data Protection Act.

#### **CCTV**

Walcote Health Ltd premises are surveyed by CCTV for the purpose of security and images and videos may be retained for a limited period.

## Accessing and updating your information

You have the right to access information held about you. Your right of access can be exercised in accordance with the Data Protection Act. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you. At any time you can request a copy of the information that we hold about you, including copies of your medical records (where relevant), by contacting:

Data Protection Officer Walcote Health Ltd Southgate Chambers 37-39 Southgate Street Winchester Hampshire SO23 9EH

If your details change or are incorrect please let us know as soon as possible.

# Changes to our privacy statement

We keep our privacy policy under regular review and as a result it may be amended from time to time without notice. As a result we encourage you to review this privacy statement regularly.

### Contact

If you have any questions in relation to our privacy statement please contact:

Business Director Walcote Health Ltd Southgate Chambers 37-39 Southgate Street Winchester Hampshire SO23 9EH