



## **Privacy Notice for Half Moon Dental Centre for Patient Data**

This Privacy Notice is a shortened form of our Privacy Policy and any patient who wishes to have a copy of our full Policy should ask .

Half Moon Dental Centre takes great care to protect the personal data we hold for you in line with the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

The purpose of collecting and storing personal data about you is to ensure we can:

- Provide, appropriate, safe, and effective dental care, treatment and advice for you.
- Fulfil any contracts we hold in relation to your care.
- For business administration of your care.

### **Personal data held for our patients**

The personal data we process (processing includes obtaining the information, using it, storing it, securing it, disclosing it, and destroying it) for you includes:

Name, Address, Date of birth, Next of kin, Email address, Phone numbers, GP contact details, Occupation, Medical history including COVID screening questions, Dental care records, Photographs, Correspondence, Details of any complaints received.

We keep an inventory of personal data we hold on our patients and this is available on request. At Half Moon Dental Centre sensitive personal information relating to our patients is only used to provide dental care for the individual. It is never shared for research purposes or any non-clinical need. The National Opt-out Policy introduced in March 2020 is therefore not operated at our practice on this basis.

Should we change our policy to use personal or sensitive personal information for a non-clinical purpose or a research project, we would then introduce the National Opt-out policy.

### **Disclosure to third parties**

The information we collect and store will not be disclosed to anyone who does not need to see it.

We will share your personal information with third parties when required by law or to enable us to deliver a service to you or where we have another legitimate reason for doing so. Third parties we may share your personal information with may include:



- Regulatory authorities such as the General Dental Council or the Care Quality Commission/Healthcare Inspectorate Wales.
- NHS Local Authorities.
- Dental payment plan administrators.
- Insurance companies.
- Loss assessors.
- Fraud prevention agencies.
- In the event of a possible sale of the practice at some time in the future.

We may also share personal information where we consider it to be in a patient's best interest or if we have reason to believe an individual may be at risk of harm or abuse.

### **Personal privacy rights**

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, you have the following personal privacy rights in relation to the information we hold about you:

- Access to and copies of your records.
- Have inaccuracies deleted.
- Have information about you erased. This should be seen in light of the need to keep records about your dental care in case you have any problems in the future.
- Object to direct marketing.
- Restrict the processing of your information, including automated decision-making.
- Take your data to another dental practice or anywhere else.

Patients who wish to have inaccuracies deleted or to have information erased must speak to the dentist who provided or provides their care.

### **Legal basis for processing data held about patients**

UK GDPR requires us to state the legal basis upon which we process all personal data for our patients, and it requires us to inform you of the legal basis on which we process your personal data.

The legal basis on which we process personal information for our private patients is .

The legal basis on which we process personal information for our payment plan patients is LEGITIMATE INTEREST.

The legal basis on which we process personal information for our NHS patients is LEGITIMATE INTEREST.



### **Automated decision making**

All individuals who have personal data held about them have a right to object to their personal data being subjected to automated decision making.

Patients will always be asked to give specific, informed, verifiable, opt in consent for any processes involving automated decision making.

### **Consent**

Half Moon Dental Centre will always obtain specific, opt in consent from you for direct marketing information. We obtain consent by VIA CONSENT FORM.

If you are a new patient, we will obtain consent when you first attend the practice. If you are an existing patient, we will obtain consent when you attend for your recall appointment or for a treatment appointment. We will refresh this consent when you complete a new medical history proforma.

### **Withdrawal of consent**

After you have given your opt in consent you have a right to withdraw your consent at any time.

### **Retention period**

This practice retains dental records and orthodontic study models while you are a patient of our practice and after you cease to be a patient for at least eleven years or for children until age 25, whichever is longer.

### **Complaints**

You have a right to complain about how we process your personal data. All complaints concerning personal data should be made in person or in writing to Mona Dobrin. All complaints will be dealt with in line with the practice complaints policy and procedures.

If you are unhappy with the resolution of your complaint, you have the right to raise your complaint with the Information Commissioner's Office (ICO).

The ICO can be contacted at <https://ico.org.uk/make-a-complaint> or you can start a [live chat](#) or call the ICO helpline on 0303 123 1113.



Further information on making a complaint to the ICO can be found here: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints>

### **Transferring personal data outside the EU**

This practice sends any necessary laboratory work outside of the EU. Laboratory work sent outside the EU will be labelled with the patient's unique identifying number rather than the patient's name. A record of the unique identifying number will be held at the practice

This Privacy Notice was reviewed and implemented on 22/1/2024.

It will be reviewed annually and is due for review on 22/1/2025 or prior to this date in accordance with new guidance or legislative changes.



**Document Change Record**  
**for**  
**UK General Data Protection Regulation (UK GDPR) and Data Protection Act**  
**2018**  
**Privacy Notice for Patient Data**

The table below is used to register all changes to the policy:

Published Date	Document Version Number	Pages affected	Description of revision	Author
01.02.2021	V3.0	Page 1	Notes on obtaining evidence of opt-in consent.	PL
01.02.2021	V3.0	Page 3	Information on when the National Opt-out Policy would apply in dental practice.	PL
24.01.2023	V3.1	Pages 2, 5 & 6	Update GDPR references and retention of dental records.	PP
09.08.2023	V3.2	Page 5	Updated the complaints section with contact details for the ICO.	PL
14.08.2023	V3.3	Page 5	Updated retention period for patient records.	PL
15.08.2023	V3.4	Page 3	Amalgamation of English & Welsh policy and renamed.	IL