

## **Privacy Policy**

**For the purposes of this policy “the Company”, “we”, “us” “our” etc.** refers to JEM Paediatric Physiotherapy.

The General Data Protection Regulation (GDPR) outlines rules in relation to the way personal data is collected, stored and disposed of. We are committed to upholding the Data Protection Principles in the interests of protecting personal data from being collected or processed inappropriately and this document explains how we use any personal data we collect about you, or others whose personal data is provided to us, as well as your rights in relation to this data.

In providing our services, we process personal data in the capacity of a ‘data processor’ - this being the carrying out of operations on data to retrieve, transform or classify personal data for specific purposes and services offered by us. This is most likely to be the case when obtaining and processing Client data for the purposes of providing our services. In this respect, we are also considered to be the ‘data controller’ – that is the person who either jointly or alone determines the purposes for which personal data can be processed. or others whose personal data is provided to us, as well as your rights in relation to this data.

We have an appointed Data Protection Officer who is responsible for overseeing questions in relation to this Privacy Policy and are registered with the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.co.uk](http://www.ico.co.uk)).

In the event that you wish to exercise any relevant rights, discuss any queries or raise a complaint in relation to this Privacy Policy, please contact us using the details provided at the end of this document.

---

## **Third-party Links Outside of Our Control**

Our website is made through Wix.com and may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

---

## **Cookies**

Cookies are small pieces of data stored on a site visitor's browser. They are typically used to keep track of the settings users have selected and interactions they have made whilst on a site.

Our website uses only essential cookies to store temporary information during your visit. This helps us to provide you with a good experience by monitoring and analysing the performance, operation and effectiveness of our website. It also helps to ensure that our website is secure and safe to use. We do not use cookie technology to collect Personal Data.

You can choose to accept or decline some/all cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. You may wish to find out more about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org)

## **The Type of Personal Data We Collect**

Personal data – means any information relating to an individual from which that individual can be identified.

The personal data obtained, used, stored and transferred is dependent on the services we provide and/or the nature of our engagement. However, in respect of the person whose personal data we are processing, this may include: -

- Identity Data – First names, maiden names, surnames, marital status, titles, date of birth, gender, nature of relationship to a Client, lifestyle and hobbies
- Contact Data – Billing address, home address, email address and telephone numbers
- Transaction Data – Details about payments from you
- Family members/ Support Staff names and contact details
- Personal Health and Lifestyle information, including reports and letters from healthcare professionals and referrers which may include NHS details
- Photographs and video footage

In some circumstances, we may also collect 'Special Category Data' which is more sensitive and identifies an individual's race, ethnic origin, political or religious beliefs, biometric data (where used for ID purposes) or trade union membership, as well as information regarding their health, sex life or sexual orientation.

---

## **Failure to Provide Personal Data**

Where we require personal data by law, or under the terms of a contract we have with you and you fail to provide personal data as requested, we may not be able to perform the contract we have or are trying to enter into with you (for example to provide you with services). In such a circumstance, we may have to cancel our service provision, but we will notify you of this at the time.

---

## **How We Collect Personal Data**

Data may be collected via a variety of methods, at any time that it is provided to us, including when you agree to use our services, from records of email correspondence or telephone calls, or when you voluntarily complete any contact forms either electronically or physically in writing.

In addition, data may be collected during delivery/provision of services or at the point of referral from an external source, including both electronic and physical documents. More recently, we have utilised video conferencing platforms to gather data, in order to mitigate the risks associated with transmission of COVID-19 by limiting face-to-face contact.

We accept no liability for the loss of postal information you send to us or liability to you. We accept no liability if other users connected with you, following an open interface/contact/interaction with us on social media, use your publicly facing profile details to seek and access publicly accessible information.

---

## **How We Use Personal Data**

We process personal data to enable us to provide services, to promote our services, and to maintain our own accounts and records in compliance with legal and regulatory obligations.

We will use your information for purposes such as providing quotations, delivery of services, communication with external third parties, and, with your agreement, keeping you informed and up to date on matters and other services that we believe may be of interest or benefit to you.

Email: [info@jemphysiotherapy.co.uk](mailto:info@jemphysiotherapy.co.uk)

Mobile: 07540270798

Website: [www.jemphysiotherapy.co.uk](http://www.jemphysiotherapy.co.uk)

2 of 5

We will not disclose your personal information to an external third party without your consent unless we have a duty of care and are permitted by law to pass the information on to the relevant service without informing you, for example in the event of a disclosure which highlights risk to the Client and/or others.

The legal basis under which we process personal data is dependent on the nature of the data in question and the context in which it is being processed. In many cases however, personal information is processed based on one, or more of the following: -

- With consent
- To meet our contract obligations as per our Terms and Conditions in providing a service to you, or to take steps towards entering such a contract
- In accordance with our legitimate interests – that being conducting and managing our business to ensure we provide you the best service and most secure experience. NB - We do not use your personal data for activities where our interests are outweighed by the potential impact (both positive and negative) on you (unless we have your consent to do so or are permitted by law)
- To comply with our legal obligations - which means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

In some circumstances we may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes.

---

## Sharing Your Personal Data

We sometimes may need to share the personal information we hold; however, we will ensure that this is limited only to those who require such access for the proper performance of their duties, or where they have a legitimate interest in relation to the processing of personal data and are also acting as processors or controllers. Examples whereby it may be necessary for us to share personal data with external third parties, include: -

- Professional advisors such as lawyers, accountants, auditors and insurers who provide consultancy legal, accounting and insurance services
- HM Revenue & Customs, regulators and other authorities who require reporting of activities in certain circumstances
- Information Communication Technology support providers
- Suppliers of Physiotherapy equipment for quoting and assessment/supply of Client-specific required devices
- Other members of the multi-disciplinary team, for example NHS physiotherapy services, general practitioners, consultants, case managers, health visitors, social care workers, safeguarding officers and medical insurance companies.  
NB – this is not an exhaustive list.

Where we engage external third parties to process personal data on our behalf, they do so on the basis of written instructions, are under the duty of confidentiality, and are obliged to implement appropriate measures to ensure the security of data. We will only share the information when it is necessary and limit any disclosure to what information is strictly necessary.

We will not disclose your personal information to a third party without your consent unless we are legally obliged to do so or in the case of an emergency, as exemplified within the 'How We Use Personal Data' section.

We will not share or sell your data to any external parties for marketing purposes, other than those that we may engage for our own internal marketing and promotional activities.

## Storing and Retaining Personal Data

Data is stored in a range of different places, this may be in electronic format on IT systems, including email accounts, and paper/hard copy. We will keep your information safe by protecting it with safeguards and controlling and monitoring who has access to it. We will keep any documents securely locked away in premises that are also secure and ensure all our employees are trained and up to date in information security and data protection. We will ensure that your data is not lost, accidentally destroyed, misused or disclosed and all personal data, in whatever format, is disposed of securely and confidentially.

We endeavour to retain personal data for no longer than is necessary for the purposes for which it is processed, including for the purposes of satisfying any legal, accounting, or reporting requirements. NB - The legal requirements for the retention of patient information for children and young people is eight years after their 18<sup>th</sup> birthday or until 25 years of age, or eight years after death.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

---

## Data Privacy Rights

As a Data Subject, unless subject to an exemption under data protection laws, you have the right to:

- Access and obtain a copy of the information we hold about you (subject access request)
- Obtain and reuse your personal data for your own purposes or to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e., where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means)
- Request to change inaccurate or incomplete data, or to stop processing data for a period, if data is inaccurate or there is a dispute about it
- Request that we stop processing or delete the information we hold about you, where it is no longer necessary to retain such data
- Withdraw consent for processing your personal data (this will not affect the processing of your data where it is based on lawful grounds, other than consent)
- Object to; -
  - the processing of your data where we rely on our legitimate interest
  - direct marketing
  - processing for the purposes of scientific/historical research and statistics

If you would like to exercise any of these rights, including making a subject access request, please contact us using the details at the end of this policy.

In the event that you request any of the above, we may need to request specific information from you to help us confirm your identity and your right to access your personal data (or any other of your rights). This is a security measure to ensure that personal data is not disclosed to any other person who has no right to receive it. Provision of further information in relation to your request may also help to speed up our response.

We aim to respond to all legitimate requests within one month. However, it may take us longer than this depending on the complexity of your request and we will endeavour to keep you updated accordingly.

## **Status of Privacy Policy**

This version was created on 24/02/2021 and historic versions can be obtained upon request. We reserve the right to amend the policy as appropriate.

Any future changes or additions to the processing of personal data as described in this Privacy Policy, which impact you, will be communicated to you in advance through an appropriate channel.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

---

## **Requests, Queries or Complaints**

To exercise any relevant rights, discuss any queries or raise a complaint in relation to this policy or any other data processing, please in the first instance contact: -

Jack Mantle – JEM Paediatric Physiotherapy

Email: [jack@jemphysiotherapy.co.uk](mailto:jack@jemphysiotherapy.co.uk) Mobile: 0754027098

NB - You have the right to make a complaint to the ICO at any time. However, we appreciate the chance to deal with your concerns before you approach the ICO and ask you to contact us in the first instance.

---