

2018

Summary

As your treating clinicians and therefore custodian of personal information relating to your medical treatment, Mr P Goodfellow and Mrs V Goodfellow and their medical secretaries must only use that information in accordance with all applicable law and guidance.

Our Privacy Notice provides you with a detailed overview of how we will manage your data from the point at which it is gathered and onwards, and how that complies with the law. We will use your personal information for a variety of purposes including, but not limited to, providing you with care and treatment, sharing it with other medical professionals and research/clinical audit programmes.

In addition, you have a number of rights as a data subject. You can, for instance, seek access to your medical information, object to me using your information in particular ways, request rectification of any information which is inaccurate or deletion of information which is no longer required (subject to certain exceptions). This Privacy Notice also sets out your rights in respect of your personal information, and how to exercise them.

For ease of reference, this Notice is broken into separate sections below with headings which will help you to navigate through the document.

Introduction:

This Privacy Notice sets out details of the information that Mr P B Goodfellow and Mrs V Goodfellow (The Surgical Practice), clinicians responsible for your treatment (including their medical secretaries) may collect from you and how that information may be used. Please take your time to read this Privacy Notice carefully.

1. This Privacy Notice:

a) provides you with a detailed overview of how we will manage your data, from the point at which it is gathered and onwards.

b) will give you all the details you need on how we use your information, and how we will comply with the law in doing so. We may also, with your specific agreement, contact you with clinical information to assist you in understanding your diagnosis or to improve your health.

c) sets out your rights in respect of your personal information, and how to exercise them. You can, for instance, seek access to your medical information, object to us using your information in particular ways and request rectification of any information which is inaccurate.

We would welcome your feedback on how we could improve the information contained within this notice.

2. About us

In this Privacy Notice we use "we" or "us" or "our" to refer to the clinicians Mr Peter Goodfellow and Mrs Vivienne Goodfellow who form the company The Surgical Practice Ltd.

2018

Our Data Controller and how to contact us

3. The Data Controller for The Surgical Practice Ltd who has responsibility for data protection compliance can be contacted by:

Email: admin@thesurgicalpractice.co.uk

Post: The Surgical Practice, c/o Claremont Hospital, 401 Sandygate Road, Sheffield, S10 5UB.

If you would like further information about any of the matters in this Privacy Notice or have any other questions about how we collect, store or use your personal information, please contact the Data controller using the details above.

Your personal data

4. As a patient your treatment will be provided by Mr P Goodfellow, consultant surgeon and Mrs V Goodfellow, nurse practitioner.
- 5.
6. Mr Goodfellow and Mrs Goodfellow will make decisions about what information is collected about you, and with The Surgical Practice Ltd will maintain a set of medical records in relation to the treatment that they provide.
7. Mr Peter Goodfellow and Mrs V Goodfellow are a data Controllers in respect of your personal information which is held within those records, meaning that they must comply with the data protection legislation and relevant guidance when handling your personal information. This includes using your personal information as set out in more detail below.
8. Mr P Goodfellow and Mrs V Goodfellow (including their medical secretaries) will handle your personal data in accordance with the principles set out within this Privacy Notice. This means that whenever they (including their medical secretaries) use your personal data, they will only do so as set out in this Privacy Notice.
9. If you have any concerns about the way your your personal information has been handled please contact the Data Controller in section 3

What personal information do we collect and use from patients?

10. The personal information that we collect will depend on your relationship with us. We will collect different information depending on whether or not you are already a patient of Mr P Goodfellow and Mrs V Goodfellow.
11. We may use "special categories of personal information" (otherwise known as "special categories of data") about you, such as information relating to your physical and mental health. For example, if you are a patient we will need to use information about your health in order to treat you.
12. If you provide personal information to us about other individuals (including medical or financial information) you should inform the individual about the contents of this Privacy Notice. We will process such information in accordance with this Privacy Notice.

2018

13. In addition, you should note that in the event you amend data which we already hold about you (for instance by amending a pre-populated form) then we will update our systems to reflect the amendments. Our systems will continue to store historical data.

Personal Information

14. As our patient the personal information we hold about you may include the following:
- a. Name
 - b. Contact details, such as postal address, email address and telephone numbers , including your mobile number
 - c. Financial information, such as credit card details used to pay us or Bacs details
 - d. Occupation
 - e. Emergency contact details, including next of kin
 - f. Background referral details
- Special Categories Personal Information

Special categories of personal data

15. As our patient, we will hold information relating to your medical treatment which is known as a special category of personal data under the law, meaning that it must be handled even more sensitively. The special categories of personal information we hold about you may include the following:

- 1) Details of your current or former physical or mental health. This may include information about any healthcare you have received or need including about clinic and hospital visits and Medicines administered; This may be from both from:
 - i. Directly the hospitals and clinics where you are being seen:
 1. Thornbury Hospital, Sheffield.
 2. Claremont Hospital, Sheffield
 3. BMI Huddersfield Hospital
 - ii. Other healthcare providers such as GPs, dentists or hospitals (private and/or NHS)
 - iii. Sometimes if we are asked to give a specialist or second opinion on your case at another hospital or clinic or GP practice
- 2) Details of services you have received from us.
- 3) Details of your nationality, race and/or ethnicity.
- 4) Details of your religion.
- 5) Details of any genetic data or biometric data relating to you
- 6) Data concerning your sex life and/or sexual orientation.

We provide further details below on the manner in which we handle such information.

16. The confidentiality of your medical information is very important to us. Mr P Goodfellow and Mrs V Goodfellow and their medical secretaries make every effort to prevent unauthorised access to and use of information relating to your current or former physical and mental health. In doing so, we comply with UK data protection law, including the Data

2018

Protection Act 2018, and all applicable medical confidentiality guidelines issued by professional bodies including, but not limited to, the General Medical Council.

17. From 25 May 2018, the current Data Protection Act will be replaced by the EU General Data Protection Regulation (GDPR) and a new Data Protection Act. All uses your information will comply with the GDPR and the new Data Protection Act from that date onwards.

How do we collect your information?

18. We may collect personal information from a number of different sources including, but not limited to:

- 1) GPs
- 2) Dentists
- 3) Other hospitals, both NHS and private
- 4) Clinicians (including their medical secretaries)
- 5) Mental health providers
- 6) Other Healthcare professions
- 7) From other healthcare organisations

Directly From you

19. Information may be collected from you when
- 1) You submit a query to us by email or via our website
 - 2) You correspond by letter, email telephone or in person
 - 3) When you make an appointment
 - 4) If you are admitted for treatment
 - 5) When you settle an invoice

From other providers and organisations

20. Patients will usually receive healthcare from other providers and organisations and so in order to provide you with the best treatment possible we may have to collect personal information about you from other organisations. These may include:
- 1) Medical records from your GP
 - 2) Medical records from other clinicians (including their medical secretaries)
 - 3) Medical records from the NHS
 - 4) Medical records from private healthcare organisation including radiology and pathology results
 - 5) Medical records from your dentist
21. Medical records include information about your diagnosis, clinic and hospital visits and Medicines administered.

2018

From third parties

22. As detailed in the previous section, it is often necessary to seek information from other healthcare organisations. We may also collect information about you from third parties when:

- 1) You are referred to us for provision of healthcare
- 2) We liaise with your current or former employer
- 3) We liaise with other treatment or benefit providers
- 4) We liaise with your family
- 5) We liaise with your insurance policy provider
- 6) We deal with other Health Care professional and other care providers about care you have received or are receiving from us
- 7) We deal with NHS health service bodies about care you have received or are receiving from us
- 8) We liaise with debt collection agencies
- 9) We liaise with Government agencies, including the Ministry of Defence, the Home Office and HMRC

How will we communicate with you?

23. In order to communicate with you, we are likely to do this by telephone, SMS, email, and/or post. If we contact you using the telephone number(s) which you have provided (landline and/or mobile), and you are not available which results in the call being directed to a voicemail and/or answering service, we may leave a voice message on your voicemail and/or answering service as appropriate.

24. However:

- 1) to ensure that we provide you with timely updates and reminders in relation to your healthcare (including basic administration information and appointment information (including reminders) we may communicate with you by SMS and/or unencrypted email (where you have provided us with your email address) in each case where you have expressed a preference in the patient registration form to be contacted by SMS and/or email.
- 2) to provide you with your medical information (including test results and other clinical updates) and/or invoicing information, we may communicate with you by email (which will be encrypted) where you have provided us with your email address and have expressed a preference in the patient registration form to be contacted by email. The first time we send you any important encrypted email eg one that we are not also sending by post or which requires action to be taken, we will endeavour to contact you separately to ensure that you are able to access the encrypted email you are sent.

2018

What are the purposes for which your information is used?

25. We may 'process' your information for a number of different purposes, which is essentially the language used by the law to mean using your data. Each time we use your data we must have a legal justification to do so. The particular justification will depend on the purpose of the proposed use of your data. When the information that we process is classed as "special category of personal information", we must have a specific additional legal justification in order to use it as proposed.
26. Generally, we will rely on the following legal justifications, or 'grounds':
- 1) For the purposes of providing you with healthcare pursuant to a contract between you and Mr P Goodfellow and Mrs V Goodfellow as part of The Surgical Practice Ltd. We will rely on this for activities such as supporting your medical treatment and providing other services to you.
 - 2) We have an appropriate business need to process your personal information and such business need does not cause harm to you. We will rely on this for activities such as quality assurance, maintaining our business records, developing and improving services and monitoring outcomes.
 - 3) We have a legal or regulatory obligation to use such personal information.
 - 4) We need to use such personal information to establish, exercise or defend our legal rights. If you have provided your consent to our use of your personal information.
27. Note that failure to provide your information further to a contractual requirement with us may mean that we are unable to set you up as a patient or facilitate the provision of your healthcare
28. We provide further detail on these grounds in the sections below.

The right to object to other uses of your personal data

29. You have a range of rights in respect of your personal data, as set out in detail in sections 69-86. This includes the right to object to The Surgical Practice Ltd using your personal information in a particular way (such as sharing that information with third parties), and we must stop using it in that way unless specific exceptions apply. This includes, for example, if it is necessary to defend a legal claim or it is otherwise necessary for the purposes of your ongoing treatment.
30. You will find details of our legal grounds for each of our processing purposes below. We have set out individually those purposes for which we will use your personal information, and under each one we set out the legal justifications, or grounds, which allow us to do so. You will note that we have set out a legal ground, as well as an 'additional' legal ground for special categories of personal information. This is because we have to demonstrate additional legal grounds where we are using information which relates to a person's healthcare, as we will be the majority of the times we use your personal information.

Purpose 1: To set you up as a patient of Mr P Goodfellow and Mrs V Goodfellow on The Surgical Practice Ltd Practice Manager system.

31. **Legal ground:** Taking the necessary steps so that you can enter into a contract with us for the delivery of healthcare.

32. **Additional legal ground for special categories of personal information:** The use is necessary for reasons of substantial public interest.

Purpose 2: To provide you with healthcare and related services.

33. The reason you come to us is to provide you with healthcare, and so we have to use your personal information for that.

34. Legal grounds:

- 1) Providing you with healthcare and related services.
- 2) Fulfilling our contract with you for the delivery of healthcare .

35. **Additional legal grounds for special categories of personal information:**

- 1) We need to use the data in order to provide healthcare services to you. The use is necessary to protect your vital interests where you are physically or legally incapable of giving consent.

Purpose 3: For account settlement purposes

36. We will use your personal information in order to ensure that your account and billing is fully accurate and up-to-date.

37. **Legal grounds:**

- 1) Our providing you healthcare and other related services.
- 2) Fulfilling our contract with you for the delivery of healthcare.
- 3) Our having an appropriate business need to use your information which does not overly prejudice you.

38. **Additional legal grounds for special categories of personal information:**

- 1) We need to use the data in order to provide healthcare services to you.
- 2) The use is necessary in order for us to establish, exercise or defend our legal rights.

Purpose 4:

39. For medical audit/research purposes

Clinical audit

40. We may need to process your personal data for the purposes of clinical audit – (an audit carried out by Mr P Goodfellow or Mrs V Goodfellow for the purposes of assessing outcomes

2018

for patients and identifying improvements which could be made for the future). We are able to do so on the basis of a legitimate interest and the public interest in statistical and scientific research, and with appropriate safeguards in place. You are, however, entitled to object to us using your personal data for this purpose, and as a result of which we would need to stop doing so. If you would like to raise such an objection then please contact our data controller using the details above in section 3.

41. We may also be asked to share information with UK registries for which ethical approval is not necessarily required but which form part of the National Clinical Audit programme, hosted by NHS England and who provide a list of National Clinical Audit and Clinical Outcome Review programmes and other quality improvement programmes which we should prioritise for participation.
42. A full copy of the current list can be found at <https://www.hqip.org.uk/list> which comprises the national organisations with whom we may share data for the purposes of audit. We may also share your data with other audit programmes which are set up by professional associations.
43. We may do so without your consent provided that the particular audit registry has received statutory approval, or where the information will be provided in a purely anonymous form, otherwise your consent will be needed. In those circumstances, the relevant registry organisation may have consent processes of their own so any questions in that regard should be directed to the organisations themselves, otherwise we will obtain that consent from you.
44. Legal grounds:
 - 1) We have a legitimate interest in helping with medical audit and research and have put appropriate safeguards in place to protect your privacy.
45. Additional legal grounds for special categories of personal information:
 - 1) The processing is necessary in the public interest for statistical and scientific research purposes

Purpose 4: Communicating with you and resolving any queries or complaints that you might have.

46. From time to time, patients may raise queries, or even complaints with us or through us. Those communications are taken very seriously. It is important that we resolve such matters fully and properly, and so we will need to use your personal information in order to do so.
47. Legal grounds:
 - 1) Our providing you with healthcare and other related services .
 - 2) Our having an appropriate business need to use your information which does not overly prejudice you.
48. Additional legal grounds for special categories of personal information:

2018

- 1) The use is necessary for the provision of healthcare or treatment pursuant to a contract with a health professional.
- 2) The use is necessary in order for us to establish, exercise or defend our legal rights.

Purpose 6: Communicating with any other individual that you ask us to update about your care and updating other healthcare professionals about your care.

49. In addition, other healthcare professionals or organisations may need to know about your treatment in order for them to provide you with safe and effective care, and so we may need to share your personal information with them. Further details on the third parties who may need access to your information is set out in section 63 below.

50. Legal grounds:

- 1) Our providing you with healthcare and other related services.
- 2) We have a legitimate interest in ensuring that other healthcare professionals who are routinely involved in your care have a full picture of your treatment.

51. Additional legal ground for special categories of personal information:

- 1) We need to use the data in order to provide healthcare services to you.
- 2) The use is necessary for reasons of substantial public interest under UK law.
- 3) The use is necessary in order for us to establish, exercise or defend our legal rights.

52. We also participate in initiatives to monitor safety and quality, helping to ensure that patients are getting the best possible outcomes from their treatment and care. The Competition and Markets Authority Private Healthcare Market Investigation Order 2014 established the Private Healthcare Information Network ("PHIN"), as an organisation who will monitor outcomes of patients who receive private treatment. Under Article 21 of that Order, the hospitals that we work at we are required to provide PHIN with information related to your treatment, including your NHS Number in England and Wales, the nature of your procedure, whether there were any complications such as infection or the need for readmission/admission to a NHS facility. This also includes the feedback you provided as part of any PROMs surveys. PHIN will use your information in order to share it with the NHS, and track whether you have received any follow-up treatment. The hospitals will only share this information with PHIN if you have provided your consent for this .

53. The records that are shared with PHIN may contain personal and medical information about patients, including you. PHIN, like us, will apply the highest standards of confidentiality to personal information in accordance with data protection laws and the duty of confidentiality. Any information that is published by PHIN will always be in anonymised statistical form and will not be shared or analysed for any purpose other than those stated. Further information about how PHIN 12 uses information, including its Privacy Notice, is available at www.phin.org.uk. We will be happy to print a copy for you if you prefer.

Purpose 7: Complying with our legal or regulatory obligations, and defending or exercising our legal rights .

54. As medical practitioners we are subject to a range of legal and regulatory responsibilities. We may be required by law or by regulators to provide personal information, and in which case we will have a legal responsibility to do so. From time to time, we may be the subject of legal actions or complaints. In order to fully investigate and respond to those actions, it is necessary to access your personal information (although only to the extent that it is necessary and relevant to the subject-matter).

55. Legal grounds:

- 1) The use is necessary in order for us to comply with our legal obligations.

56. Additional legal ground for special categories of personal information:

- 1) We need to use the data in order for others to provide informed healthcare services to you.
- 2) The use is necessary for reasons of the provision of health or social care or treatment or the management of health or social care systems.
- 3) The use is necessary for establishing, exercising or defending legal claims.

57. As detailed we participate in initiatives to ensure that patients are getting the best possible outcomes from their treatment and care. The records that we share may contain personal and medical information about patients, including you. With respect to PHIN the hospitals at which we practice will only share information with them with your consent. PHIN, will apply the highest standards of confidentiality to personal information in accordance with data protection laws and the duty of confidentiality. Any information that is published by PHIN will always be in anonymised statistical form and will not be shared or analysed for any purpose other than those stated. Further information about how PHIN uses information, including its Privacy Notice, is available at www.phin.org.uk. We will be happy to print a copy for you if you prefer.

58. We are also required by law to conduct audits of health records, including medical information, for quality assurance purposes. Your personal and medical information will be treated in accordance with guidance issued by the Care Quality Commission (England), Health Inspectorate Wales and Healthcare Improvement Scotland Purpose.

Purpose 8: Providing improved quality, training and security.

59. We are always looking to learn from patients' experiences in order to improve the experience for future patients. In order to do this, we will use your personal information to identify where such improvements can be made.

60. Legal grounds:

- 1) Having an appropriate clinical need to use your information which does not overly prejudice you.

2018

- 2) Additional legal ground for special categories of personal information: a) We need to use the data in order to manage the healthcare services we deliver, including carrying out surveys (which are not a form of marketing) in order to identify and carry out any necessary improvements.

Purpose 9: Managing our business operations such as maintaining accounting records, analysis of financial results, internal audit requirements, receiving professional advice (eg tax or legal advice).

61. In order to do this, we **will not need to use** your special categories of personal information and so we have not identified the additional ground to use your information for this purpose.
62. Legal grounds:
Our having an appropriate business need to use your information which does not overly prejudice you.

Who do we share your information with?

63. We may share your information with third parties.

Disclosures to third parties:

64. We may disclose your information to the third parties listed below for the purposes described in this Privacy Notice. This might include:
 - 1) Your GP
 - 2) A doctor, nurse, carer or any other healthcare professional involved in your treatment.
 - 3) Anyone that you ask us to communicate with or provide as an emergency contact, for example your next of kin or carer.
 - 4) Your pharmacist
 - 5) Your dentist
 - 6) Other clinicians (including their medical secretaries)
 - 7) Other members of support staff involved in the delivery of your care, like receptionists and porters.
 - 8) NHS organisations, including NHS England, Department of Health.
 - 9) Other private sector healthcare providers.
 - 10) Third parties who assist in the administration of your healthcare, such as insurance companies.
 - 11) Private Healthcare Information Network.
 - 12) National and other professional research/audit programmes and registries, as detailed under purpose 4 above.
 - 13) Government bodies, including the Ministry of Defence, the Home Office and HMRC.
 - 14) HealthCare regulators, like the Care Quality Commission.
 - 15) The police and other third parties where reasonably necessary for the prevention or detection of crime.
 - 16) Our insurers.
 - 17) Debt collection agencies.

2018

- 18) Our third party services providers such as IT suppliers, auditors, lawyers, document management providers and tax advisers .
- 19) We may communicate with these third parties in a variety of ways including, but not limited to, email, post, fax and telephone.

How long do we keep personal information for?

65. We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Notice in order to comply with our legal and regulatory obligations. Medical records are governed by The Records Management Code of Practice for Health and Social Care 2016.

International data transfers.

66. We may request for information or transfer information to countries outside the European Economic Area ("EEA") to assist in your medical care . Where we request or make a transfer of your personal information outside of the EEA we will take the required steps to ensure that your personal information is protected.
 67. To the extent that it is relevant and necessary to do so to assist in your medical care. This would be done:
 - 1) If you are receiving medical care outside the EEA,
 - 2) If you have received medical care outside the EEA and this information would assist in your care with us.
 - 3) If you are returning home to an area outside of the EEA having received treatment with us and you wish us to communicate with a healthcare provider.
 68. The United States and the EEA have in place a framework, known as Privacy Shield, to facilitate compliance with data protection obligations when transferring personal data. Privacy Shield has been assessed by the EU Commission, and deemed to provide adequate protection to personal data.
 69. If you would like further information regarding the steps we take to safeguard your personal information, please contact the us using the details set out in section 3. Please note that we have listed above the current common transfers of personal data outside of the EEA but it may be necessary, in future, to transfer such data for other purposes. In the event that it is necessary to do so, we will update this Privacy Notice.
- Your rights.**
70. Under data protection law you have certain rights in relation to the personal information that we hold about you. These include rights to know what information we hold about you and how it is used. You may exercise these rights at any time by contacting us using the details set out above at section 3 above.
 71. There will not usually be a charge for handling a request to exercise your rights.

2018

- 72. If we cannot comply with your request to exercise your rights we will usually tell you why.
- 73. There are some special rules about how these rights apply to health information as set out in legislation including the Data Protection Act (current and future), the General Data Protection Regulation as well as any secondary legislation which regulates the use of personal information.
- 74. If you make a large number of requests or it is clear that it is not reasonable for us to comply with a request then we do not have to respond. Alternatively, we can charge for responding.

The right to access your personal information .

- 75. You are usually entitled to a copy of the personal information we hold about you and details about how we use it.
- 76. Your information will usually be provided to you in writing, unless otherwise requested. If you have made the request electronically (eg by email) the information will be provided to you by electronic means where possible.
- 77. Please note that in some cases we may not be able to fully comply with your request, for example if your request involves the personal data of another person and it would not be fair to that person to provide it to you.
- 78. You are entitled to the following under data protection law.
 - 1) Under Article 15(1) of the GDPR we must usually confirm whether we have personal information about you. If we do hold personal information about you we usually need to explain to you:
 - i. The purposes for which we use your personal information
 - ii. The types of personal information we hold about you.
 - iii. Who your personal information has been or will be shared with, including in particular organisations based outside the EEA.
 - iv. If your personal information leaves the EU, how we make sure that it is protected.
 - v. Where possible, the length of time we expect to hold your personal information. If that is not possible, the criteria we use to determine how long we hold your information for.
 - vi. If the personal data we hold about you was not provided by you, details of the source of the information.
 - vii. Whether we make any decisions about you solely by computer and if so details of how those decision are made and the impact they may have on you.
 - viii. Your right to ask us to amend or delete your personal information.
 - ix. Your right to ask us to restrict how your personal information is used or to object to our use of your personal information.

- x. Your right to complain to the Information Commissioner's Office
- 2) We also need to provide you with a copy of your personal data.

The right to rectification

- 79. We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you do not believe this is the case, you can ask us to update or amend it.

The right to erasure (also known as the right to be forgotten).

- 80. In some circumstances, you have the right to request that we delete the personal information we hold about you. However, there are exceptions to this right and in certain circumstances we can refuse to delete the information in question. In particular, for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims.

The right to restriction of processing

- 81. In some circumstances, we must "pause" our use of your personal data if you ask us to. We do not have to comply with all requests to restrict our use of your personal information. In particular, for example, we do not have to comply with your request if it is necessary to keep your information in order to perform tasks which are in the public interest, including public health, or for the purposes of establishing, exercise or defending legal claims. The right to data portability.

The right to data portability

- 82. In some circumstances, we must transfer personal information that you have provided to us to you or (if this is technically feasible another individual/ organisation of your choice. The information must be transferred in an electronic format.

The right to withdraw consent

- 83. In some cases, we need your consent in order for our use of your personal information to comply with data protection legislation.
- 84. Where we do this, you have the right to withdraw your consent to further use of your personal information. You can do this by contacting The Surgical Practice data controller whose details can be found in section 3.

The right to complain to the Information Commissioner's Office.

- 85. You can complain to the Information Commissioner's Office if you are unhappy with the way that we have dealt with a request from you to exercise any of these rights, or if you think we have not complied with our legal obligations.

2018

86. More information can be found on the Information Commissioner's Office website:
<https://ico.org.uk/>.

87. Making a complaint will not affect any other legal rights or remedies that you have.

National Data Opt-Out Programme

88. NHS Digital is currently developing a national programme which will go live on 25 May 2018, pursuant to which all patients will be able to log their preferences as to sharing of their personal information. All health and care organisations will be required to uphold patient choices, but only from March 2020. In the meantime you should make The Surgical Practice Ltd aware of any uses of your data to which you object.

Updates to this Privacy Notice

89. We may update this Privacy Notice from time to time to ensure that it remains accurate, and the most up-to-date version will be provided to you at your request. In the event that there are any material changes to the manner in which your personal information is to be used then we will provide you with an updated copy of this privacy notice.

90. This Privacy Notice was last updated on 14th of Sept 2018.