

Privacy Policy relating to Your Personal Data

Thank you for you registering as a patient of Dr Saideman’s private practice. Confidentiality is an integral aspect of Dr Saideman’s professional relationship with you. Your information will be kept confidential and subject to this Privacy Policy. Personal data will be processed in compliance with applicable UK data protection law (including, as applicable, the General Data Protection Regulation (“GDPR”). Please read through this Privacy Policy and ask Dr Saideman any questions you may have in relation to it. As you will see, Dr Saideman has asked you to sign (below) your acknowledgement to having read and agreed to the Privacy Policy and to your consent to the processing of your personal data in certain circumstances.

PATIENT CONSENT

I hereby confirm that I have read and agree to this Privacy Policy and hereby consent to:

- (i) the processing of my personal data and my personal sensitive data by Dr Saideman;
- (ii) the disclosure of my personal data or personal sensitive data by Dr Saideman to:
 - any consultant to whom I am referred by Dr Saideman (as may be considered and chosen by Dr Saideman in discussion with me) for the purposes of obtaining further medical care, treatment, scanning, testing and reporting and the processing of such data by such consultant;
 - any hospital or clinic to whom I am referred by Dr Saideman (as may be considered and chosen by Dr Saideman in discussion with me) for the purposes of obtaining further medical care, treatment, scanning, testing and reporting and the processing of such data by such hospital or clinic;
 - any pathology laboratory (or similar laboratory) suggested by Dr Saideman for the purposes of obtaining, scanning, testing and reporting and the processing of such data by such pathology or similar laboratory;
 - my NHS GP practice and/or any of my other GPs (for the purpose of information and updating any of my medical records);
 - any private health insurance company or organisation as identified by me to Dr Saideman for the purpose of obtaining payment for services or treatment; and/or
 - companies that provide Dr Saideman with cloud based customer relationship management (“CRM”) systems for the purpose of Dr Saideman storing and processing her records in providing her medical care for me (as referred to in this Privacy Policy); and
- (iii) if applicable, the processing of my personal data and my personal sensitive data outside the European Economic Area, even where such countries may not have similar appropriate safeguards (as referred to in this Privacy Policy).

Signature: *	Date of signature:
Full name of Patient:	* Full name of Parent/Legal Guardian (if applicable):

** Where the Patient is a child under the age of 16, the signature and consent above is made by me as parent/legal guardian for and on behalf of the Patient.*

ABOUT THIS PRIVACY POLICY

Dr Saideman is committed to protecting the privacy of any “personal data” she receives or obtains from you (or about you) as her patient. Dr Saideman is registered as a “data controller” with the UK Information Commissioner’s Office with registration number ZA034153. A data controller is the person who determines the purposes for which (and the manner in which) personal data is to be processed. “Processed” includes, among other things, the collection, recording, organisation or storage of personal data. Personal data will be processed in compliance with UK applicable data protection law (including, as applicable, the General Data Protection Regulation (“GDPR”).

By you becoming a patient and asking Dr Saideman to be your doctor, you consent to the use and processing of your personal data for the purposes (and in the circumstances) described in this Privacy Policy. It is hoped that this Privacy Policy will help you understand:

- what personal data is;
- how and why it is collected;
- how it is used and when it might be shared with others;
- how it is protected; and
- your rights in relation to the personal data held about you.

Dr Saideman reserves the right to update this Privacy Policy at any time and will provide you with a new Privacy Policy when any substantial updates are made.

WHAT IS PERSONAL DATA?

Personal data means any information relating to an individual (a “data subject”) from which the individual can be identified. This might include (among other things): the individual’s date of birth, home address, e-mail address, contact details, telephone numbers, any credit/debit card or bank account details, private medical insurance coverage or passport details.

Certain categories of personal data, referred to as “**sensitive personal data**”, are considered to be of a particularly sensitive nature. Such sensitive personal data relates to an individual’s physical and mental health or condition (please note that personal sensitive data may also include a health professional’s medical opinion about the individual, in addition to medical facts and information). Information relating to an individual’s physical or mental health or condition will form part of the individual’s health record, which will build up over time. Sensitive personal data requires higher levels of protection and justification for processing. Such sensitive personal data can only be processed in certain circumstances, including among others, where:

- a patient has given explicit consent to the processing of such sensitive personal data for one or more specified purposes;
- processing is necessary to protect the vital interests of the patient where the patient is physically or legally incapable of giving consent;
- processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services or pursuant to a contract with a health professional;
- processing is necessary for reasons of public interest in the area of public health; and/or
- the processing is necessary in connection with legal proceedings (including any prospective legal proceedings), to obtain legal advice or to exercise legal rights.

Data controllers are required by applicable data protection law to ensure that any personal data is:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that have been explained to you;
- relevant to the purposes you have been told about and limited only to those purposes;
- accurate and kept up to date;

- kept only as long as necessary for the purposes; and
- kept securely.

HOW AND WHY IS PERSONAL DATA COLLECTED?

Dr Saideman will collect personal data about you (as her patient). The personal data will be collected so that Dr Saideman can store, transfer and otherwise process such personal data for the purposes of attending to your medical care and treatment (and also the processing of records in the event of an emergency).

Such personal data will be obtained from you (or others), for example:

- when you complete the Practice Registration Form (or similar forms) with your personal details and medical history;
- during consultations with you (whether in person or over the telephone) and medical examinations – whether with Dr Saideman or other health professional (such as any consultants to whom you are referred); and
- written medical reports, results of any tests, scans and investigations relating to your care and treatment received from health professionals (such as any consultants to whom you are referred or your NHS GP practice) any hospitals, clinics or pathology laboratories.

Your duty to inform Dr Saideman of any changes to your personal: It is important that the personal data Dr Saideman holds is accurate and current. Please keep Dr Saideman informed if your personal data (or if the personal data you have provided to us relating to other individuals) changes.

HOW DR SAIDEMAN USES PERSONAL DATA

Most commonly, Dr Saideman will use personal data in the following circumstances:

- in providing you with medical care and treatment;
- in corresponding with any doctors, consultants, hospitals and/or clinics, to whom you are referred by Dr Saideman (as may be considered and chosen by Dr Saideman in discussion with you), for the purposes of obtaining further medical care, treatment, scanning, testing and reporting;
- in ordering any pathology results or tests from any laboratories;
- in relation to the payment of invoices, charges and expenses arising from Dr Saideman's services to you;
- in corresponding with any private health insurance company or organisations (including your employer) in connection with your treatment (eg. for the purpose of obtaining payment for services or treatment); and/or
- in the management, storing and record keeping of your personal data on Dr Saideman's computer system and/or on cloud based customer relationship management ("CRM") systems or applications (referred to in this Privacy Policy).
- in satisfying any legal, regulatory or accounting reporting requirements (or in relation to any legal claims or investigations); and/or
- where it is necessary for Dr Saideman's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Dr Saideman may also use your personal data in the following situations:

- where Dr Saideman needs to protect your interests (or someone else's interests); and/or
- where it is needed in the public interest or for official purposes.

Some of the above grounds for using or processing personal data will overlap and there may be several grounds which justify Dr Saideman's use of such personal data. Dr Saideman will only use your personal data for the purposes for which it is collected it, unless Dr Saideman reasonably considers that it is

required for another reason and that reason is compatible with the original purpose. If Dr Saideman needs to use your personal data for an unrelated purpose, Dr Saideman will notify you and explain the legal basis for this.

Individuals will not ordinarily be subject to decisions that will have a significant impact on them based solely on “automated decision-making” (namely, where an electronic system uses personal data to make a decision without human intervention), unless Dr Saideman has a lawful basis for doing so and has notified you.

SHARING AND PROCESSING PERSONAL DATA WITH OTHERS

Dr Saideman is entitled (under applicable data protection law) to process your personal data, including personal sensitive data, in connection with your medical care and treatment. As mentioned above, there will be occasions where Dr Saideman will wish to disclose your personal data (including personal sensitive data) to others in relation to your medical care and treatment, for example:

- other doctors, consultants, hospitals and/or clinics, to whom you are referred by Dr Saideman (as may be considered and chosen by Dr Saideman in discussion with you), for the purposes of obtaining further medical care, treatment, scanning, testing and reporting;
- pathology laboratories in relation to any pathology (or similar) tests; and/or
- any private health insurance company or organisations in connection with your treatment (eg. for the purpose of obtaining payment for services or treatment).

Cloud based management system used by the Practice (to process your personal data):

Dr Saideman uses a cloud based customer relationship management (“**CRM**”) system and application to store and process patient personal data, for the purpose of enhancing the management of medical records and the provision of medical services to patients. The CRM used by Dr Saideman is called “*WriteUpp*”, which provides Dr Saideman with unique secure access to the personal data the medical records of Dr Saideman’s patients. “*WriteUpp*” is a well-known system also used by other medical practitioners and organisations in relation to their patients and practices. The “*WriteUpp*” system is owned by Pathway Software (UK) Limited (an English company), which offers strict security access, confidentiality and data protection policies for the processing of patient personal data by their doctors. Further details about “*WriteUpp*”, including information about Pathway Software (UK) Limited’s data protection and privacy policies can be found on their website at www.writeupp.com.

Transferring information outside the European Economic Area (EEA)

In certain circumstances, your personal data may be transferred outside the European Economic Area (the EEA consists of all Member States of the European Union, together with Iceland, Liechtenstein and Norway). While some countries have adequate protections for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it (these include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an “international framework” of protection).

PROTECTION OF PERSONAL DATA

Data security: Dr Saideman is committed to protecting the privacy of the personal data of her patients and has put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Third parties will only process your personal data on Dr Saideman’s instructions and where they have confirmed to Dr Saideman that they will treat the information confidential, keep it secure and process such personal data in compliance with applicable data protection legislation.

How long will Dr Saideman use your personal data for? Dr Saideman will retain your personal data for as long as necessary to fulfil the purposes it is collected for (as mentioned in this Privacy Policy). To

determine the appropriate retention period for personal data, Dr Saideman considers the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which it is processed and whether those purposes can be achieved through other means, and the applicable legal requirements. Dr Saideman will retain personal data for as long as you use Dr Saideman's services and then for up to ten years thereafter, subject to legal or applicable regulatory requirements.

WHAT ARE YOUR RIGHTS IN RELATION TO THE PERSONAL DATA?

Under certain circumstances, by law you have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data Dr Saideman holds about you and to check that Dr Saideman is lawfully processing it.
- **Request correction of the personal data held about you.** This enables you to have any incomplete or inaccurate information Dr Saideman holds about you corrected.
- **Request erasure of your personal data.** This enables you to ask Dr Saideman to delete or remove personal data where there is no good reason for Dr Saideman continuing to process it. You also have the right to ask Dr Saideman to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing of your personal data.** This would arise where Dr Saideman is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where Dr Saideman is processing your personal data for direct marketing purposes.
- **Request the restriction of processing of your personal data.** This enables you to ask Dr Saideman to suspend the processing of personal data about you, for example if you want Dr Saideman to establish its accuracy or the reason for processing it.
- **Request the transfer of your personal data to another party.**

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that Dr Saideman transfers a copy of your personal data to another party, please contact Dr Saideman at drsuzanne@saidemanpractice.com. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, Dr Saideman may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, Dr Saideman may refuse to comply with the request in such circumstances. Before providing you with details of the personal data Dr Saideman may hold (in response to you making a data subject access request), Dr Saideman will seek specific information from you to help Dr Saideman confirm your identity and ensure your right to access the information. This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Right to withdraw consent: In circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Dr Saideman at drsuzanne@saidemanpractice.com. Once Dr Saideman has received notification that you have withdrawn your consent, Dr Saideman will no longer process your information for the purpose or purposes you originally agreed to, unless Dr Saideman has another legitimate basis for doing so in law or regulatory requirements.

WHO TO CONTACT / QUESTIONS ABOUT THIS PRIVACY POLICY / COMPLAINTS

If you have any questions about this Privacy Policy or how your personal data is handles, please contact Dr Saideman at drsuzanne@saidemanpractice.com.

You also have the right to make a complaint at any time to the UK Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.