

Footwell Podiatry  
put your best foot forward



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## **PRIVACY AND COOKIE POLICY**

in respect of

FOOTWELL PODIATRY

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# Privacy Policy

www.footwellpodiatry.co.uk (**Website**) is brought to you by **Footwell Podiatry ('we' or 'us')** whose address is: **Room 3, The Olney Treatment Rooms, Berrells Court, East Street, Olney MK46 4AR.**

## Why you should read this policy

We take the privacy of our patients and visitors to our Website (**you**) very seriously. Please read this privacy policy (**Policy**) carefully as it contains important information about how your personal data will be used.

For the purposes of the Data Protection Act 1998, the GDPR (2018), and the Data Protection Bill when in force and all other relevant legislation, Hilary Rimmer is the 'data controller' (is responsible for, and controls the processing of, your personal data).

## Personal data we may collect about you

### Information that you provide

Personal information about you (such as your name, email address, phone number) will be obtained, whenever you complete forms on the Website.

We will also obtain personal information you provide when you fill in any patient forms we provide you with, send feedback, post material, contact us for any reason and by any medium, sign up to a service or report a problem with the Website.

We will ask you to provide sensitive personal data before providing any treatments or services to you.

We may retain a record of any contact you make with us.

## Personal Information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her data;
- receive on his/her behalf and data protection notices;
- give consent to any transfer of his/her data;

## **Information from third parties**

Occasionally we may receive information about you from other sources (such as your GP), which will be added to the information already held about you in order for us to help supply our services to you.

## **Information that will be collected automatically**

**Cookies:** We may monitor your use of the Website through the use of cookies and similar tracking devices. For example, we may monitor how many times you use the Website, which pages you go to and traffic data. This information helps to build a profile of users to the Website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. For further information on the use of cookies on the Website, please see the sections on cookies below.

**Device information:** We may also collect information about your device each time you use the Website. For example, we may collect information on the type of mobile device that you are using and its unique device identifier (for example, the IMEI number, the device's mobile phone number, or the MAC address of the device's wireless network interface), the type of mobile browser that you are using, the mobile operating system that you are using, mobile network information and the time zone setting.

**Location data:** We may also collect information to determine your location using GPS technology or such other location tracking software we may use from time to time. Some of the features of the Website may require access to such location data to work. If you would like to use any such feature, you will be asked to consent to provide such location information. You can withdraw your consent to providing this information at any time by emailing [enquiries@olneytreatmentrooms.com](mailto:enquiries@olneytreatmentrooms.com) or contacting us via the contact details at the bottom of this policy.

## **How your personal data will be used**

We will use your personal data for the following purposes:

- to help identify you, your patient records.
- administration;
- research, statistical analysis and behavioural analysis;
- improving our services and products.

## **Marketing and opting out**

The Website may contain links to other websites or apps which we or our partners own, or websites or apps of our partners or third parties. Please note that if you follow any of these links, the websites, apps and services provided through them will have their own privacy policies/terms of use. We do not accept any responsibility or liability for their respective privacy policies/terms of use or the collection and use of any personal data collected through these websites, apps or services. Please ensure that you review the relevant privacy policies/terms of use prior to providing any personal data to, or using these websites, apps and services.

## **Disclosure of your personal data**

We may disclose your personal data to:

- All healthcare practitioners who work at Footwell Podiatry;
- Your doctor, GP or other medical professionals;
- other companies or businesses that become partners with Footwell Podiatry;
- a third party who acquires substantially all of Footwell Podiatry assets, in which case the personal data shall be one of the acquired assets;
- our agents and service providers;
- law enforcement and regulatory agencies in connection with any investigation to help prevent unlawful activity or as otherwise required by applicable law;

## **Keeping your data secure**

We will use technical and organisational measures to safeguard your personal data, for example:

- We will store your personal data on secure servers, using password protected devices;
- While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet.
- Personal data is stored in paper notes in a locked filing cabinet.

## **Transfers of data out of the EEA**

We will make reasonable efforts to ensure that your data is not transferred outside the European Economic Area (**EEA**). Where we use data servers that may transfer data out of the EEA we will take steps to ensure adequate protections are in place to ensure the security of your information and give you remedies in the unlikely event of a security breach.

All information you provide to us is stored with secure data processors for the purposes of storing your data, accounting purposes and social media purposes for example. A copy of your information is also stored securely on our internal server and computers where access is restricted.

Please note that any processors we utilise that may transfer your data to the US, comply with the **EU-US Privacy Shield Framework**, which is a mechanism that ensures compliance with EU data protection requirements when transferring personal data from the European Union to the United States. You can learn more about Privacy Shield here: <https://www.privacyshield.gov/welcome>

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us using our contact details at the bottom of this policy.

## **What you can do to keep your information safe**

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **Monitoring**

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

## **Your Consent and Rights of Access**

We will only collect and store information about you as detailed above. You will be provided with opportunities to consent to this Privacy Policy and marketing when you provide your personal details to us.

You can change your mind or remove or amend your consent at any time.

- You have the **right of access** to your personal records or other information that we hold about you. There is no administrative charge for this service.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, or out of date, please contact us and we will correct this immediately.
- You have the **right to have the data we hold about you erased**.
- If you wish us to continue to store your information but **wish us to keep your data separate** and not process it in any way, please let us know and we will do so.
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.
- You have the **right to object to any direct marketing**.

To revise your consent, access, amend or remove your records or assert any of your rights set out above, you should send your request in writing to us at [enquiries@olneytreatmentrooms.com](mailto:enquiries@olneytreatmentrooms.com) You will need to provide proof of identity and address (eg a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, amended or removed.

### **How long we will store your data**

Footwell Podiatry will retain your personal information only for as long as is necessary to provide you with podiatry services and as described in my Privacy Policy. However, it may be necessary to retain this information to comply with legal and regulatory obligations, to resolve disputes, and to enforce agreements. The retention of podiatry records is normally a minimum of 8 years, after the last appointment. For customers who are not patients but may have bought products from the business, any data you may have provided will be kept for a minimum of 6 years in line with tax legislation.

The data will be deleted in the following circumstances:

- You have withdrawn your consent to data processing
- The original purpose for processing the data is no longer relevant or cannot be performed any more.
- The data is no longer up to date or accurate.

## **Children**

Should you be under the age of 16 and have any questions about this Privacy Policy, please contact us using the details below and we shall be happy to explain how we use and process your data.

## **Use of cookies**

A cookie is a small text file which is placed onto your mobile (or other electronic device) when you access the Website. We use cookies and other online tracking devices on the Website to:

- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve the Website content, products and services and to help us better understand our visitor and customer requirements and interests;
- target our marketing and advertising campaigns and those of our partners more effectively by providing interest-based advertisements that are personalised to your interests; and
- make your online experience more efficient and enjoyable.

The information we obtain from the use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally. In certain circumstances we may collect personal information about you—but only where you voluntarily provide it (eg by completing an online form).

In most cases we will need your consent in order to use cookies on this Website. The exception is where the cookie is essential in order for us to provide you with a service you have requested

## **Consent (notification on home page)**

There is a notice on the Website home page which describes how cookies are used and which also provides a link to this Policy. You will be presented with an option to accept the terms of this Privacy and Cookie Policy. If you use this Website after this notification has been displayed to you, you warrant that you have consented to the use of cookies for the purposes described in this Website privacy policy.

## Description of cookies and similar technologies

The cookies that we utilise on our Website are placed to fulfil such functions as allowing visitors to share content with a range of networking and sharing platforms, analysing how you use the Website and giving you a better more personalised experience.

Our Website uses the following cookies:

- **Session cookies** expire at the end of your browser session and allow us to link your actions during that particular browser session.
- **Persistent cookies** are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.

Cookie	Description
'scrollTop',	Used to temporarily record the distance the user has scrolled down the page and which helps to improve the way forms are re-displayed in the event of an error. It expires when the user turns off his computer and does not contain any personally identifiable information.
_ga _gid _gat_gtag_UA_1202101951	Used by Google Analytics to provide us with website visit statistics. We use the 'anonymize_ip' option to further ensure your privacy.

## How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of the Website. For further information about cookies and how to disable them please go to: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Our contact details

We welcome your feedback and questions. If you wish to contact us, please send us an email to [enquiries@olneytreatmentrooms.com](mailto:enquiries@olneytreatmentrooms.com). You can also write to us at Footwell Podiatry, The Olney Treatment Rooms, Berrells Court, East Street, Olney MK46 4AR or call us on 01234 240444.

### **Changes to this privacy policy**

We may change this Policy from time to time. You should check this policy frequently to ensure you are aware of the most recent version that will apply each time you use the Website.

### **Data Protection Supervisory Authority**

The Data Protection Supervisory Authority in the UK is the Information Commissioners Office. Should you have any complaints about the way we handle your data, you may direct them to the ICO. More information on the ICO can be found on their website here: <https://ico.org.uk>