

Privacy Notice

Who we are?

Trew Eyecare is a private independent Opticians operating from 118 Poole Road, Bournemouth BH4 9EF. We are registered with the Information Commissioners Office as a Data Controller, registration number ZA159758.

Your Privacy

This policy provides detailed information on when and why we collect your personal information, how we use it and the very limited conditions under which we may disclose it to others.

Your privacy matters to us and we are committed to the highest data privacy standards, patient confidentiality and adherence with the Data Protection Act 2018 and UK GDPR. We adopt the six core principles of data protection.

Collection of your Personal Data

Where you provide personal data to us, we will become responsible for it as the data controller.

We will only collect data that is necessary for us to deliver the best possible service and ensure that you are reminded about appointments or information relevant to your ongoing care.

We collect your personal information directly from you, for example, when you visit our practice, get in touch with us by telephone or email, use our booking system or when you visit our website.

We may also collect it from other sources if it is legal to do so. This includes from the NHS or other healthcare providers, institutions or people you have authorised to provide information on your behalf (for example, parents or guardians), third-party service providers, government, tax or law-enforcement agencies, and others.

Main Categories and Type of Personal Data Collected and processed.

Processing Activity	Personal Data Required/Held	Retention Time	Reason to hold Data
Optical service and products	Name, date of birth, telephone numbers, address and email Current and past health and medication information, family history, your examination results, and lifestyle information. Data received other healthcare professionals as part of your ongoing care	10 years after last contact or until age 25, whichever is later	Contract – in order to provide the service or products you have requested Where health data is processed, we do so for the provision of healthcare.

Reminders	Name, email address, address, telephone numbers	10 years after last contact or until age 25, whichever is later or until asked to stop by you	Contract – In order to provide the ongoing service appointment reminders are sent
Marketing	Name, email address, address, telephone number	Until asked to stop by you or until consent withdrawn by you	Legitimate interests – we will provide information which we believe is of genuine interest to you. Consent – you have given consent to receive information about products or services that are of interest to you
Credit/Debit card payments	Cardholder name, card number, security number	Duration of the transaction	Contract – you have agreed to provide these details to pay for the service or products ordered
Collection of online identifiers for analytical purposes (Cookies)	Cookie information IP address Device ID Session ID Interaction history Website feedback	See Cookie Policy https://treweyecare.co.uk/cookie-policy/	Consent – Ensuring visitors get the best experience.

We treat all personal data as sensitive but acknowledge that we also process special category data including health data and children’s data.

Sharing of Personal Data

During the delivery of our service to you, we will share your data with other companies who are critical for the provision of our service to you and will be viewed as Data Processors. They are under contract with us and have provided sufficient guarantees that they will process your data only as per the terms of that contract and throughout processing activities will ensure your data is protected using appropriate technical and organisation measures.

Our operations are based in the UK, and your personal information is generally processed within the UK and countries within the European Economic Area (EEA). In some instances, we may transfer your personal information to third countries, for example, where our suppliers or cloud service providers are situated outside the UK and EEA.

If the recipient is situated in a third country that has not received an adequacy decision from the relevant regulator, we will ensure additional safeguards are in place including the use of applicable standard contractual clauses.

A full list of processors is available from our Data Protection Officer.

Where necessary we may disclose your information to health care professionals including the NHS. We may also pass information to external agencies and organisations, including the police, for the prevention and detection of fraud and criminal activity. Should any claim be made, we may pass

your personal information to our insurers and, if our business is wholly or partially transferred to a third party, your personal information may be one of the transferred assets.

Securing and Processing of your Personal Data

To provide and manage our services your electronic data is stored and processed by Optix Software Ltd within their UK facilities, certified to ISO27001, which has appropriate security processes in place.

Your data is also stored within our own IT systems, which are secured to prevent access or intrusion by anyone who is not authorised to have access to your data. Our practice is operated to ensure that all records and equipment holding your personal data are physically protected.

In the unlikely event that we lose your data, or a device on which your data resides, or it is accessed by someone unauthorised, we will inform you if the loss or unauthorised access of your data has potential to cause you harm. We may report this to the Information Commissioners Office, who are responsible for regulating data protection legislation in the UK.

<https://ico.org.uk/>

Your rights in relation to personal data

Under UK data protection law, you have following rights which you can exercise by emailing our Data Protection Officer on TrewEyecareDPO@ClinicalDPO.com

Right	Explanation
Right to be Informed	This means that we have to be transparent in how we collect and use your personal data
Right of Access	You have the right to access your personal data.
Right to Rectification	If the information we hold about you is inaccurate or incomplete you can request that we correct this
Right to Erasure	You can request that we delete or remove personal data in certain circumstances
Right to Restrict Processing	You have the right to request that we cease processing your data if <ul style="list-style-type: none"> • you consider it inaccurate or incomplete and/or • you object to the reason we're processing your data We will review the validity of your request and respond to you with our decision
Right to Data Portability	Where you have consented to our processing your data or where the processing is necessary for us to deliver a contract you can request a copy of that data be provided to a third party
Right to Object	You have the right to object to our processing in certain circumstances and an absolute right to object to direct marketing.
Rights relating to Automated Decision-Making including Profiling	We do not use automated decision-making or profiling Where automated decision-making is applied, organisations must <ul style="list-style-type: none"> • give you information about the processing • introduce simple ways for you to request human intervention or challenge a decision • carry out regular checks to make sure that our systems are working as intended

If you are unhappy with anything we have done with your data, you have the right to complain to the Information Commissioners Office.

To make a complaint to the Information Commissioners Office use the link below or call their hotline on Tel No.: 0303 123 1113.

<https://ico.org.uk/concerns/>

How to contact us?

For all data protection matters or questions relating to how we manage your data, you can contact our Data Protection Officer via these means:

Data Protection Officer:	Clinical DPO
Phone Number	0203 411 2848
Email:	TrewEyecareDPO@ClinicalDPO.com

National Data Opt Out Statement

Trew Eyecare is one of many organisations working in the health and care system to improve care for patients and the public.

Whenever you use a health or care service, such as attending Accident & Emergency or using Community Care services, important information about you is collected in a patient record for that service. Collecting this information helps to ensure you get the best possible care and treatment.

The information collected about you when you use these services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear legal basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this where allowed by law.

Most of the time, anonymised data is used for research and planning so that you cannot be identified in which case your confidential patient information isn't needed.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters. On this web page you will:

- See what is meant by confidential patient information
- Find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care
- Find out more about the benefits of sharing data
- Understand more about who uses the data
- Find out how your data is protected
- Be able to access the system to view, set or change your opt-out setting
- Find the contact telephone number if you want to know any more or to set/change your opt-out by phone
- See the situations where the opt-out will not apply

You can also find out more about how patient information is used at:

<https://www.hra.nhs.uk/information-about-patients/> (which covers health and care research); and

<https://understandingpatientdata.org.uk/what-you-need-know> (which covers how and why patient information is used, the safeguards and how decisions are made)

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

Health and care organisations have until July 2022 to put systems and processes in place so they can be compliant with the national data opt-out and apply your choice to any confidential patient information they use or share for purposes beyond your individual care. Our organisation is currently compliant with the national data opt-out policy.