

Privacy Policy for Patients' Personal Data

This information has been prepared exclusively for use in Apolline clients' practices and as such should not be shared with anyone else. The information was prepared to reflect our thinking on what is required for UK GDPR. It is not definitive guidance and Apolline Ltd accepts no responsibility for the validity or correctness of this document or any consequences arising as a result of its use by practices. Practices should obtain independent legal advice regarding their personal situation should they require definitive advice and guidance.

Notes on obtaining evidence of opt-in consent

Practices should choose how they will evidence that they have obtained opt in consent from their patients in relation to data protection and UK GDPR requirements.

You may choose to ask patients to:

- Sign individual draft consent forms.
- Sign GDPR questions added to the medical history form.
- Check boxes utilising the practice record keeping software.

Privacy Policy for Crescent Dental Surgery for Patient Data

Crescent Dental Surgery great care to protect the personal data we hold for our patients in line with the requirements of the Data Protection Act 2018 which is the UK's implementation of the General Data Protection Regulation (UK GDPR).

The purpose of collecting and storing personal data about our patients is to ensure we can:

- Provide, appropriate, safe and effective dental care, treatment and advice for all our patients.
- Fulfil any contracts we hold in relation to their care.
- For business administration of their care.

Personal data held for our patients

The personal data we process (processing includes obtaining the information, using it, storing it, securing it, disclosing it, and destroying it) for our patients includes:

- Name, address, date of birth.
- Unique identification number.
- Next of kin.
- Email address.
- Phone numbers.
- GP contact details.
- Medical history.
- Dental care records.
- Photographs.
- Family group.
- Payment plan details.
- Financial information.
- Credit cards receipts.
- Correspondence.
- Details of any complaints received.

We keep an inventory of personal data we hold on our patients and this is available for patients on request. A list of personal information held is also included in our Privacy Notice, which is on display for all patients.

National Opt-out Policy

At Crescent Dental Surgery sensitive personal information relating to our patients is only used to provide dental care for the individual. It is never shared for research purposes or any non-clinical need. The National Opt-out Policy introduced in March 2020 is therefore not operated at our practice on this basis.

Should we change our policy to use information for a non-clinical purpose or a research project, we would then introduce the National Opt-out policy.

Disclosure to third parties

The information we collect and store will not be disclosed to anyone who does not need to see it.

We will share our patients' personal information with third parties when required by law, to enable us to deliver a service to them, or where we have another legitimate reason for doing so. Third parties we may share patients' personal information with may include:

- Regulatory authorities such as the General Dental Council and the National Health and Social Care regulators.
- NHS Local Authorities
- Dental payment plan administrators
- Insurance companies
- Loss assessors
- Fraud prevention agencies
- In the event of a possible sale of the practice at some time in the future.

We may also share personal information where we consider it to be in a patient's best interest or if we have reason to believe an individual may be at risk of harm or abuse.

Personal privacy rights

Under the UK GDPR and the Data Protection Act 2018, all individuals who have personal information held about them have the following personal privacy rights:

- Right to subject access.
- Right to have inaccuracies deleted.
- Right to have information erased.
- Right to object to direct marketing.
- Right to restrict the processing of their information, including automated decision-making.
- Right to data portability.

Patients who wish to have inaccuracies deleted or to have information erased must speak to the dentist who provided or provides their care.

Legal basis for processing data held about patients

The UK GDPR requires us to state the legal basis upon which we process all personal data for our patients, and it requires us to inform our patients of the legal basis on which we process their personal data.

The legal bases for recording individual types of data are recorded in our patient personal data inventory. This is available for all patients to see on request.

The legal basis on which we process personal information for our private patients is 'legal obligation'.

The legal basis on which we process personal information for our payment plan patients is 'contract'.

The legal basis on which we process personal information for our NHS patients is 'legal obligation'.

Automated decision making

All individuals who have personal data held about them have a right to object to their personal data being subjected to automated decision making.

Patients will always be asked to give specific, informed, verifiable, opt in consent for any processes involving automated decision making.

Consent

Crescent Dental Surgery may need to contact our patients, their families or third-party organisations regarding patients' appointments, medical histories, and treatment. Where possible, we will obtain prior consent to process and share this information.

Where patients have not previously consented to or have withdrawn their consent for us to contact, share or process their data, we will assess whether the need for processing is proportionate and necessary in relation to the risk to the individual and/or the public if the information is not shared.

Crescent Dental Surgery always obtains specific, unambiguous opt in consent from all patients to whom we send direct marketing information. The consent for marketing is included in the medical history form.

For a new patient, we obtain consent for these things when the patient first attends the practice. For an existing patient, we ask the patient for consent when they attend for their recall appointment or for a treatment appointment. We refresh this consent annually when the patient completes a new medical history proforma.

Withdrawal of consent

Patients who have given their opt in consent have a right to withdraw their consent at any time. Patients are advised of their right to withdraw their opt in consent for anything they wish to withdraw from in our privacy notice.

Retention period

This practice retains dental records and orthodontic study models while you are a patient of our practice and after you cease to be a patient for at least eleven years or for children until age 25, whichever is longer.

Complaints

All individuals who have personal data held about them have a right to complain. All complaints concerning personal data should be made in person or in writing to Smitha Govind. All complaints will be dealt with in line with the practice complaints policy and procedures.

If you are unhappy with the resolution of your complaint, you have the right to raise your complaint with the Information Commissioner's Office (ICO).

The ICO can be contacted at <https://ico.org.uk/make-a-complaint>, via [live chat](#) or call the ICO helpline on 0303 123 1113.

Further information on making a complaint to the ICO can be found here: <https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints>

Transferring personal data outside the EU

Patients' personal data is not transferred outside the EU.

This Policy was reviewed and implemented on: 06/02/2025

This policy and relevant procedures will be reviewed annually and are due for review on 06/02/2026 or prior to this date in accordance with new guidance or legislative changes.

Document Change Record for Privacy Policy for Patient Data

The table below is used to register all changes to the policy:

Published Date	Document Version Number	Pages affected	Description of revision	Author
22.07.2020	v2.2	Page 1	Purpose for collecting data updated to reflect COVID-19 pandemic	LH
22.07.2020	v2.2	Page 5	Obtaining consent during the COVID-19 pandemic	LH
01.02.2021	v3.1	Page 1	Notes on obtaining evidence of opt-in consent.	PL
01.02.2021	v3.1	Page 3	Information on when the National Opt-out Policy would apply in dental practice	PL
24/01/2023	v3.2	All	Removal of pandemic references, update reflecting changes to GDPR within the UK	PP
14.08.2023	v3.3	Various	Updated the complaints section with contact details for the ICO. Updated retention period for patient records. Amalgamation of English & Welsh policy and renamed.	PL/IL
09.02.2024	v3.4	Whole document	Introduction updated to include options for 'opt-in' consent. Legal bases now included. The single policy applies to England, Wales, Scotland & Northern Ireland.	IL