

# Privacy Policy

Welcome to Move and Improves privacy policy.

Move and Improve respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we handle your personal data, regardless of where you interact with us – whether online, in person, or via email. It also outlines your privacy rights and how the law protects your data.

## Purpose of this privacy policy

This privacy policy aims to provide you with information on how Move and Improve collects and processes your personal data, including any data you may provide through our website, email communication, or in person. Please read this privacy policy alongside any other notices we may provide on specific occasions when we collect or process your personal data, so you are fully aware of how and why we use your data. This privacy policy supplements other notices and is not intended to override them.

## Controller

Move and Improve is the controller and is responsible for your personal data. Throughout this privacy policy, "we," "us," and "our" refer to Move and Improve. We have appointed a data protection officer (DPO) who is responsible for overseeing questions related to this privacy policy. If you have any questions about this policy or wish to exercise your legal rights (explained below), please contact the DPO using the details provided below.

## Contact details of DPO

Name of DPO: Mrs Kate Montgomery

Email address: [info@moveandimprovephysio.co.uk](mailto:info@moveandimprovephysio.co.uk)

If you have any questions regarding how your personal data is handled, please contact us directly so we can discuss your concerns. You have the right to file a complaint at any time with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

It is important that you keep us informed if your personal data changes during your time under our care.

## Third-party links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on these links or enabling these connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## The data we collect about you

Personal data, or personal information, refers to any information about an individual by which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer different types of personal data about you, which we have grouped as follows:

- **Identity Data:** Includes first name, last name, marital status, title, date of birth, and gender.
- **Contact Data:** Includes billing address, email address, and telephone numbers.
- **Financial Data:** Includes bank account and payment card details.
- **Transaction Data:** Includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data:** Includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Usage Data:** Includes information about how you use our website and services.
- **Marketing and Communications Data:** Includes your preferences for receiving marketing from us and our third parties and your communication preferences.
- **Medical Data:** Includes information about patients' health and well-being, which is classified as Special Category Personal Data. We use this information to provide treatment to you.
- **Aggregated Data:** We also collect, use, and share Aggregated Data, such as statistical or demographic data, for various purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law since it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data and use it in accordance with this privacy policy.
- **Special Category Data:** Additional protections are afforded to particularly sensitive personal data, such as data relating to a person's health, race, ethnic origin, politics, religion, trade union membership, genetics, biometrics (used for ID purposes), or sexual orientation. We only process data concerning our patients' health and well-being, which is considered special category data. For the processing of this special category data, we are required to have both a lawful basis and satisfy a separate condition, such as necessity for medical diagnosis or providing healthcare, under the GDPR.

## **If you fail to provide personal data**

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have with you or are trying to enter into with you. For example, we may need your data to provide our services, and if you do not provide it, we may have to cancel those services. If this is the case, we will notify you at the time.

## **How is your personal data collected?**

We use various methods to collect data from and about you, including:

- **Direct interactions:** You may provide us with Medical, Identity, Contact, and Financial Data by filling in our patient information forms or corresponding with us through postal mail, phone, email, or other means. This includes personal data you provide when you complete our patient information forms, apply for our services, request marketing materials, or provide feedback.

- Automated technologies or interactions: As you interact with our website, we may automatically collect Technical Data about your device, browsing actions, and patterns. We collect this personal data through the use of cookies and similar technologies.

## **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To personalize your appointments with Move and Improve Physiotherapy.
- To ensure your safety during our appointments.
- To respond to your questions or queries.
- To contact you regarding marketing our products or services.
- To send statements, invoices, or payment reminders.
- To send email notifications (unless you have unsubscribed).
- To process inquiries or complaints related to our appointments or website.
- To maintain the security of our website and prevent fraud.

## **Cookies**

Use of HTTP cookies: HTTP cookies are small blocks of information created by your web server while browsing our website. More than one cookie may be placed on your device during your visit.

We may use these cookies to gather information about your device to assist us in improving our website and your online experience while on our website.

Cookies are used for statistical purposes and do not identify personal details. You have the right and ability to adjust your device settings to decline the use of cookies.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason that is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and explain the legal basis for doing so. Please note that we may process your personal data without your knowledge or consent if required or permitted by law.

## **Disclosure of your personal data**

We will not disclose your personal information to any other party, except in accordance with this privacy policy and the following circumstances:

- We may disclose your personal information to another Physiotherapist, insurers, professional advisers, suppliers as reasonably necessary.
- We may disclose your personal information to other healthcare professionals and institutions who will provide you with further care, including your GP and third-party professionals providing diagnostic screening services.
- We may disclose your personal information to establish, exercise, or defend our legal rights.
- We may disclose your personal information when legally required to do so.

- We may disclose your personal information to further fraud protection and reduce the risk of fraud.
- We may disclose your personal information if Move and Improve is sold.
- We may disclose your personal information to third parties in the event that we choose to sell, transfer, or merge parts of our business or assets. Alternatively, if we seek to acquire other businesses or merge with them, the new owners may use your personal data in the same way as outlined in this privacy policy.
- We require all third parties to respect the security of your personal data and treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions or medical standards and practices.

## **Data security**

We have implemented appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized manner, altered, or disclosed. In addition, we limit access to your personal data to those employees and other third parties who have a business need to know. They will only process your personal data based on our instructions and are subject to a duty of confidentiality.

We have established procedures to address any suspected personal data breaches and will notify you and any relevant regulator of a breach when legally required.

## **Data retention**

We will retain your personal data only for as long as necessary to fulfil the purposes for which we collected it, including legal, accounting, or reporting requirements. An adult patient's file will be retained for a period of seven years and a child's file will be retained until they reach the age of 25 following their discharge from treatment.

To determine the appropriate retention period for personal data, we consider various factors, including the amount, nature, and sensitivity of the personal data, the potential risk of unauthorized use or disclosure, the purposes for which we process your data, and whether we can achieve those purposes through alternative means. We also consider applicable legal requirements.

## **Your legal rights**

You have the following rights:

- 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 we hold about you and verify that we are lawfully processing it.
- Request correction of your personal data. This allows you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data when there is no valid reason for us to continue processing it. You also have the right to ask us to delete or remove your personal data when you have exercised your right to object to processing, when we have processed your information unlawfully, or when we are required to erase your data to comply with local law. Please note that we may not always be able to comply

with your erasure request for specific legal reasons, which will be communicated to you if applicable.

- Object to the processing of your personal data when we rely on legitimate interests or those of a third party, and your particular situation makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information that override your rights and freedoms.
- Request restriction of the processing of your personal data. This allows you to ask us to suspend the processing of your personal data in certain scenarios, such as when you want us to establish the data's accuracy, when our use of the data is unlawful but you do not want us to erase it, when you need us to hold the data for legal claims, or when you have objected to our use of your data while we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format to you or a third party of your choice. This right applies only to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.
- No fee usually required.
- You will not have to pay a fee to access your personal data or exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to unauthorized individuals. We may also contact you to request further information related to your request to expedite our response.

## Time limit to respond

We strive to respond to all legitimate requests within one month. In some cases, particularly if your request is complex or if you have made multiple requests, it may take us longer than a month to respond. In such cases, we will notify you and keep you informed.

## Lawful Basis

- **Legitimate Interest:** This refers to the interest of our business in conducting and managing our operations to provide you with the best service and experience while ensuring the security of your data. We carefully consider and balance the potential impact on you, both positive and negative, and your rights before processing your personal data for our legitimate interests. We do not use your personal data when our interests are overridden by their impact on you, unless we have your consent or are otherwise required or permitted by law.
- **Performance of Contract:** We process your data when necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Compliance with Legal or Regulatory Obligations:** We process your personal data when necessary to comply with legal or regulatory obligations to which we are subject.