



FACIAL AESTHETICS

# Privacy Policy and Cookies:

## About You

Facial Aesthetics is focussed on protecting your privacy. As a medical provider we fully understand the importance of ensuring that your personal data is protected and we go above and beyond our clinical and ethical responsibility to always protect your personal data in accordance with our obligations under the General Data Protection Regulation (GDPR).

## About Us

Facial Aesthetics is a limited company registered in England # 04800776. Our registered office is The Clinic, Park House, Park Road, Rivenhall, Essex CM8 3PS, Tel 01376 584555

Facial Aesthetics have an appointed data protection officer (Matthew Scott) and should you have any questions please contact him directly at [info@facialaesthetics.co.uk](mailto:info@facialaesthetics.co.uk) / Tel 01376 584555 detailing your request.

For the purpose of the Data Protection Act 1998 (“Act”) the Data Controller is Facial Aesthetics Limited The Clinic, Park House, Park Road, Rivenhall, Essex CM8 3PS.

As part of our GDPR implementation and review we have conducted a thorough review of our business and interactions with third party vendors, details of which can be provided upon request.

## About the Privacy Policy

Our privacy policy provides you with the basis that we collect personal information on you, sets out the basis and how we process any personal information we collect from you / you provide to us. It is important that you read the below to understand our views and practices regarding your personal information and how we treat it.

## What is Personal Data

Personal data is information relating to an identified or identifiable person. It can include name, address, date of birth, telephone number(s), email address. In relation to a medical practice personal data may also include data, such as that relating to an individual’s health.

## Information Collected From You

We may collect and process the following personal information about you, as a result of Information you provide.

- Medical Records – This Information is important and forms part of your treatment plan when you enrol for a treatment. Such data is provided by you in your consent forms and generally includes name, address, DOB, e-mail, phone number and medical history. We may also record and receive information from other healthcare professionals and from our own staff with regards your health which may include details of your treatment and care.

Unfortunately this is integral to your treatment plan and failing to provide us with this information will result in us being unable to provide treatment.

- Treatment Enquiries – We may record your details in order to call you about enquiries you have made about treatments, in addition to arranging appointments. This includes information such as your name, e-mail address or phone number that you have provided to us through our website, by email, by phone or by a third party referral website (such as whatclinic.com and consultingroom.com)

Failing to provide us with this information for marketing purposes will have no impact upon the provision of your treatment.

- On our website we have a contact form, for you to be able to contact us you will have to provide your name, telephone, email and reason for enquiry. We have included a check box for you to confirm you are willing to be contacted and have read our privacy policy.

#### Web Browser Information

The following data is collected automatically when visiting ([www.facialaesthetics.co.uk](http://www.facialaesthetics.co.uk)) and when you interact with the website content, by means of viewing pages within the site.

- Technical information, including IP address, browser type and version, time zone setting, browser plug-in types and version, operating system and platform. We do not link IP addresses to anything personally identifiable. This means that a user's session will be tracked, but the user will be anonymous. You can browse our site without entering any personal information, and therefore remain anonymous during your visit. However, forms may ask for personal information such as name, postal address, email address and telephone number to enable us to send out the requested information, and make any future visits to our site easier
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page.

#### How is your information utilised?

When providing personal information to us, we will only use that information as part of your treatment plan and where possible we will always make clear the reason for providing that information. This information could be used for anyone or all of the following reasons.

- To provide you with the information, treatments, products and services that you request from us.

- To provide an appropriate treatment plan to treat any of your skin concerns that you discuss with us.
- To monitor and keep records of our communication with you and are staff.
- Internally, to inform decisions about our business operations or strategy
- To notify you about changes to our business
- To remind you of any appointments booked with us – which could be by email, phone or text message.
- To contact you for post-treatment follow up and care, including survey requests in order to improve our service
- To contact you from time to time to market other services, treatments and products we provide and think may be of interest to you, based on your interests and preferences where you have made them known to us.

Rest assured we will never knowingly share your information with another company for marketing purposes.

#### The Information we collect about you

Information could be used for anyone or all of the following reasons.

- To administer our website [www.facialaesthetics.co.uk](http://www.facialaesthetics.co.uk)
- For internal operations, including troubleshooting, data analysis, research, statistical and survey purposes
- To improve our website to ensure that content is presented in the most effective manner for you and for your computer
- To allow you to participate in interactive features of our website, when you choose to do so
- As part of our efforts to keep our website safe and secure
- To deliver relevant advertising to you
- To make recommendations to you about goods or services that may interest you.
- Information you record in our clinic management software which you would have completed or been provided as part of any current or previous treatment consent.
- We may also record information from our own staff with regards your health which may include details of your health, treatment and care.

#### Organisation we may share your Personal Data with

We take our obligations clinical confidentiality requirements very seriously, this is both from a medical ethics perspective with regards our medical code of conduct and also under the General Data Protection Regulation. We may share your personal information with any one or more of the following:

- Sensitive information relating to your medical history will be kept confidential and will only be disclosed to the individuals involved with delivering your treatment.
- Other members of Facial Aesthetics Clinic staff as part of your ongoing care provisions, or for the purpose of analysing the business
- Selected third parties such as your doctor or hospital Pathology departments for diagnostic purposes for any medical condition relating to you, and or selected pharmacy providers such as Wigmore Pharmacy but only for the purposes of providing a prescription for you in order to provide your agreed treatment.

Opting out of sharing your information with these providers will affect our ability to treat you since we will not be able to provide a prescription for certain prescription only products.

- Your information is stored on our clinic management software and we have taken steps to ensure that your data on the software is secure.
- We may from time to time use email software such as Mailchimp (mail software website) for sending you marketing emails, these emails will only relate to services that we provide. The information provided will only be your email address as a means of sending you an email.
- There may also be circumstances where we are under a duty to disclose your personal information or share your personal information in order to comply with any legal or regulatory requirement, obligation or request. This includes the police for the prevention or investigation of a crime, or our Insurers, legal advisors or other third parties who need access to it in the context of managing, investigating or defending claims or complaints.

### Your Information

- Due to possible cyber hacks from email exchange we cannot guarantee that the information you send us over the internet is secure, but once we receive your information we will take all reasonable steps to protect the information you supply to us.
- Facial Aesthetics will not transfer your data outside of the European Economic Area. Backups of electronically stored data are taken regularly, with encryption to protect all files.
- Under the General Data Protection Regulation, we will only hold personal identifiable data for the maximum retention periods:
  - Job applications and unsuccessful interview candidates – 6 months
  - Employee Records – 6 years following termination of contract
  - Financial Records – 7 years
  - Marketing Enquiries and Emails – 6 months
  - Controlled Drugs Register or Prescription Information – 2 years
  - Medical Records – 7 years following last appointment

### Internet Cookies and Analytics

- Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good user experience when you browse our website and also allows us to improve our Site.
- A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.
- Some cookies are placed on your computer during the visit to our site – these are known as “session cookies”, these expire when you close the browser
- There are other cookies that remain on your device for a period of time, these are known as “persistent cookies”.
- Please note cookies can't harm your computer, and are anonymous with no identifiable information about you.

- You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Site.
  - To find out more information about cookies and how to allow, block, delete and manage the cookies on all standard web browsers, go to AboutCookies.org for help. On how to manage cookies please visit <http://www.allaboutcookies.org/manage-cookies/>
- Certain aspects of our site provide video content and links to other websites when accessing this data any tracking cookies may also be stored by those companies websites - this is known as “Third Party” cookies.

We can not be responsible for their use of your data so you should refer to their data protection policy.

A common example is an embedded YouTube video. Our site includes the following which use cookies:

- YouTube – Privacy Policy powers the videos on our site. For further information, read YouTube’s privacy policy ([https://www.youtube.com/static?template=privacy\\_guidelines&gl=GB](https://www.youtube.com/static?template=privacy_guidelines&gl=GB))
- Disabling these cookies will likely break the functions offered by these third parties

Please bear in mind that if you do this, some features of our website may not function correctly or may not be provided to you.

You can also delete cookies already stored on your computer:

- in Internet Explorer, you must manually delete cookie files;
  - in Firefox, you can delete cookies by, first ensuring that cookies are to be deleted when you “clear private data” (this setting can be changed by clicking “Tools”, “Options” and “Settings” in the “Private Data” box) and then clicking “Clear private data” in the “Tools” menu
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- We may on occasion use a third party company to track how different people use our site, this will be conducted anonymously and your personal information will not be provided and is merely as a means of seeing how individuals interact with our site.
  - We have links to our website from social media platforms such as Facebook, Twitter, Instagram etc, when accessing via any of these sites you will need to review the individual companies privacy policy as we cannot be responsible for their use of your data.
  - We may use Google Analytics, Google Analytics cookies anonymously tracks visitor statistics via cookies
    - For these purposes we use cookies to compile visitor statistics such as
      - How many people have visited our website
      - What type of technology they are using (e.g. Mac or Windows which helps to identify when our site isn’t working as it should for particular technologies)

- how long they spend on the site
  - What page they look at etc.
- This helps us to continuously improve our website. These so called “analytics” programs also tell us if , on an anonymous basis, how people reached this site (e.g. from a search engine) and whether they have been here before.

[To opt out of being tracked by Google Analytics across all websites visit http://tools.google.com/dlpage/gaoptout.](http://tools.google.com/dlpage/gaoptout)

### Your Rights

- The right to be informed and for you to access your personal data
- The right to rectification (correction of inaccuracies) of your personal data
- The right to be forgotten / erasure of your personal data.
- You have the right to ask us not to process your personal information, but where consent is withdrawn for the processing of personal data from your medical records, our ability to continue your treatments will be impaired.
- You have the right to ask us not to process your personal information for marketing purposes. We will only contact you for marketing purposes if you have opted in to receive such communications.
  - If you wish to stop receiving some or all marketing communications from us, you can let us know by email to: [Julie@facialaesthetics.co.uk](mailto:Julie@facialaesthetics.co.uk).
  - Our website [www.facialaesthetics.co.uk](http://www.facialaesthetics.co.uk) may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these website, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites and you will have to contact those sites with regards your right to be forgotten.
  - In some circumstances, you have the right to be forgotten and we will erase all data held about you. Medical records are exempt from erasure before our maximum retention periods. Requests for erasure should be made in writing to [Julie@facialaesthetics.co.uk](mailto:Julie@facialaesthetics.co.uk) and will be assessed on a case by case basis and we will notify you of our response.

### Accessing your information

Under the General Data Protection Regulation you have the right to access information held about you. Any requests should be made in writing to the Practice Manager, The Clinic, Park House, Park Road, Rivenhall, Essex CM8 3PS.

All records will be supplied in an electronic format within 1 month of receipt of the Subject Access Request.

All requests will be subject to the appropriate identification checks. Whilst there is no charge for the first copy of your record, we reserve the right to charge a small administrative fee for all subsequent copies of the same record.

### Contact and Complaints

Should you have any comments, questions and or requests regarding this privacy policy please contact the Practice Manager The Clinic, Park House, Park Road, Rivenhall, Essex CM8 3PS or [info@facialaesthetics.co.uk](mailto:info@facialaesthetics.co.uk).

You have the right to complain to a supervisory authority if you feel that we have breached the terms outlaid in our Privacy Policy. Complaints can be made to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or further information can be found at [www.ico.org.uk](http://www.ico.org.uk)

This privacy policy was last updated on 16<sup>th</sup> May 2018.