



POLICY: Privacy

Date: May 2018

Introduction

This Privacy Policy describes how we process the personal data we may collect from you.

We respect your privacy and are committed to protecting your personal information.

We know that there is a lot of information here, but we want you to be fully informed about how CT Dent Ltd uses your data.

About us

CT Dent Ltd is a company incorporated in England and Wales (registered number 06150929) whose registered office is at New Burlington House, 1075 Finchley Road, London, NW11 0PU.

CT Dent Ltd offers X-ray services for healthcare professionals, whom by law must be registered with the regulatory body for their profession.

CT Dent Ltd processes personal data as defined in the General Data Protection Regulation (Regulation (EU) 2016/679) and is registered under the Data Protection Act, number ZA323675.

The CQC Registered Manager is responsible for the implementation and update of this policy.

For simplicity throughout this privacy policy references 'we', 'us' and 'our' means CT Dent Ltd

What is our legal basis for processing your information

We are required to process personal information of data subjects to conduct our service of dental and maxillofacial dental radiology.

We will only collect personal data about you where we have your consent to do so.

For healthcare professionals we collect your data when you register your details in order to use our services and to keep you informed of our news, events and educational opportunities in relation to dental and maxillofacial radiology.

For patients we collect your data when your healthcare professional refers you to us for X-ray imaging. We also collect and process your X-ray data.

What Personal Data Do We Collect

For a healthcare professional to refer their patients to us they must register their details with us. We ask for your title, your full name as it appears on the regulatory body register, your regulatory body registration number, correspondence address, contact telephone number, email address, details of where to send invoices and preferred imaging output format and delivery method. We can also store payment details for automatic transactional payment of invoices using the tokenization framework.

We also ask that you choose a password, which along with your email address allows you access to your account, enables you to confirm electronic bookings and to open X-ray data. You are responsible for keeping this password confidential. We ask for you not to share this password and to only use your own account when referring patients to us.

You can edit any of these details by logging into our web hosted management portal.

For patients referred to us for X-ray imaging both personal and sensitive data is needed in order that the duty holders of the Ionising Radiation (Medical Exposure) Regulations (IR(ME)R) 2017 comply with the legislation.

For each patient we require the following personal data:

- First name and family name
- Date of birth
- Home address
- Telephone number / mobile number
- Email address

For each patient we require the following sensitive personal data:

- Type of X-ray examination
- Region of interest for X-ray examination
- Clinical indications and any other relevant medical/dental history and images

All of this data for patients must be supplied to us as either an electronic or written referral form. It is the responsibility of the healthcare professional to notify the patient that they will be sharing their personal and sensitive personal data with us.

For each patient we collect and store the following sensitive personal data:

- X-ray images
- X-ray doses

In accordance with regulation 17 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 once the patients scan pathway is complete and if we have been provided with the patients email address they will receive from us an email asking for their feedback.

What Do We Use Your Data For

For healthcare professionals we use your data

- (a) to identify you if you need to contact us if you have a query, need help or technical support
- (b) to enable you to use the full range of features in the web hosted management portal
- (c) to confirm your details against the regulatory body register
- (d) to fulfil the Service Level Agreement
- (e) to comply with the Ionising Radiations Regulation 2017 and the Ionising Radiation (Medical Exposure) Regulations 2017
- (f) to send you and maintain records of financial transactions
- (g) to keep you updated about our services and educational opportunities
- (h) to provide feedback emails and issue CPD certificates
- (i) to notify you of any data breaches

For patients we use your data

- (a) to identify you when we contact you or you contact us
- (b) to contact you to arrange, remind you of and to notify you of any changes to your appointment
- (c) to justify and take the X-ray examination on behalf of your healthcare professional
- (d) to reformat your X-ray data into the chosen format for your healthcare professional
- (e) to enable you to send us your feedback following your X-ray examination
- (f) to send you an invoice confirming payment for your X-ray examination (if applicable)
- (g) to notify you of any data breaches

How Long Will We Keep Your Data

We will only keep your data for as long as is necessary for the purpose it was collected.

For healthcare professionals we will keep your personal data for as long as you are entered into a data processing agreement with us. For educational events we will normally retain your personal data for 6 years from the course attendance or purchase.

For X-ray records for patients referred to us we follow The College of Radiologists position statement on the Records Management Code of

Practice for Health and Social Care 2016: application of the Code to radiology records retention protocol. The code requires:

1. For adults, imaging data should be retained for eight years since the patient was last seen in the organisation that stores the data and is responsible for retention of it.
2. For children, imaging data should be retained until the child's 26th birthday or eight years since the child was last seen - whichever is later - in the organisation that stores the data and is responsible for retention of it.
3. When data held in accordance with this policy is erased or destroyed, it must be done so securely in accordance with best practice at the time.

Who Do We Share Your Data With

We will not sell or share your personal data with third parties unless there is a legal obligation for us to do so, in line with our regulatory requirements.

We are not always able to format the X-ray data into the chosen format and so sometimes will need to share your personal data with trusted third parties for processing. The processor may only use your data for the exact purposes with which it has been shared with them for.

Third party management is in place to ensure that suppliers are best able to meet their obligations with respect to data privacy and establishing transparent arrangements through data sharing and data processing agreements.

We currently share data with the following processors:

- *3D Diagnostix for Simplant reformatting of CBCT scans and radiology reporting of CBCT scans and 2D X-ray imaging
- *CephX for cephalometric X-ray analyses
- IDT Scans for Simplant reformatting and radiology reporting of CBCT scans
- Rebecca Davies - Specialist in Dental and Maxillofacial Radiology, for radiology reporting

**These companies maintain an EU-U.S. Privacy Shield registration which is recognised by the Information Commissioner's Office.*

Our marketing database is maintained by In House Media Ltd who are registered under the Data Protection Act, number ZA240762.

How Do We Protect Your Personal Data

We take information governance seriously. We map our data and identify what we have, what we are doing with it, where it is, where it goes and who has access to it.

Personal data is stored electronically with encryption on our web hosted management portal. This is ISO 27001 certificated, we have a dedicated internet provider address and we have a secure socket layer (SSL) certificate

for the web domain ct-dent.co.uk. This means all incoming and stored data on the portal is retained securely on a dedicated server. We also have the R1Soft Backup Hosting Service which ensures continuous protection of all data on the server.

X-ray data is stored locally on the hard drive of each X-ray acquisition workstation in each of our imaging centres. This is stored in binary DICOM format and identifiable by the date and time of the scan. This data can be retrieved into the viewing software on the acquisition workstation. The X-ray data is processed into the output requested by the healthcare professional and returned by CD or a secure link from our server.

We employ access control so your data is only able to be accessed by those with a relevant job role. All employees must also adhere to the Data Protection and Information Sharing and Storage Policies.

When your personal data is shared with third parties this is done where possible through a Secure File Transfer Protocol (SFTP).

Information Correction and Deletion

If you believe that the data we have about you is incorrect, you can contact us so we can update it and keep it accurate.

If at any point you wish for us to delete information about you, you can simply contact us and as long as we are able to do this in line with applicable legislation and data retention recommendations we will.

Access to your data

You have the right to request access to the data we have about you by making a Subject Access Request (SAR). We will comply with any request within one month of the request.

A copy of the information will be provided free of charge, however a reasonable fee based on the administrative cost of providing the information will be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive. A reasonable fee may also be applied to comply with requests for further copies of the same information.

Patients can contact us by telephone, email or in writing to request a copy of their X-ray data which can be sent electronically or on CD in the i-CAT Vision or PACS formats. Instructions for how to open the scan will also be sent.

How to Contact us

Please contact us on 02074875717 or email alex@ct-dent.co.uk or write to us at CT Dent Ltd., Conan Doyle House, 2 Devonshire Place, London, W1G 6HJ if you have any questions about this privacy policy. We will reply to you as promptly as possible.

Your rights

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your data, you have the right to lodge a complaint with the Information Commissioner's Office. This can be done by calling them on 0303123113 or going online to www.ico.org.uk/concerns.

Changes to this Policy

We may update or amend this Privacy Notice from time to time, to comply with the law, applicable legislation or to meet our changing business requirements. We encourage you to review this privacy policy for any changes.