

## Privacy Notice

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### Who we are?

Kelly Eyecare, Kelly Eyecare Ltd and Kelly Eyecare Opticians, trading as Kelly eyecare, are independent Opticians registered as data controllers with the ICO, and operating from:

43 Brookley Road, Brockenhurst, Hants, SO42 7RB. ICO registration Z5531459  
 369 Wimborne Road, Winton, Bournemouth, Dorset BH9 2AQ. ICO registration Z9014280  
 17 High Street, Ringwood Hampshire, BH24 1AB. ICO registration Z9014232

### 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
<b>Optical service and products</b>	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	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.

	professionals as part of your ongoing care		
<b>Reminders</b>	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
<b>Marketing</b>	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
<b>Credit/Debit card payments</b>	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
<b>Collection of online identifiers for analytical purposes (Cookies)</b>	Cookie information IP address Device ID Session ID Interaction history Website feedback	See Cookie Policy <a href="https://www.kellyeyecare.co.uk/cookies-policy">https://www.kellyeyecare.co.uk/cookies-policy</a>	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 practices are 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 have a duty to inform you immediately if the loss or unauthorised access of your data has potential to cause you harm. We will also 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 [KellyEyeCaredpo@clinicaldpo.com](mailto:KellyEyeCaredpo@clinicaldpo.com)

<b>Right</b>	<b>Explanation</b>
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	<p>You have the right to request that we cease processing your data if</p> <ul style="list-style-type: none"> <li>• you consider it inaccurate or incomplete and/or</li> <li>• you object to the reason we're processing your data</li> </ul> <p>We will review the validity of your request and respond to you with our decision</p>
Right to Data Portability	<p>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</p>
Right to Object	<p>You have the right to object to our processing in certain circumstances and an absolute right to object to direct marketing</p>
Rights relating to Automated Decision-Making including Profiling	<p>We do not use automated decision-making or profiling Where automated decision-making is applied, organisations must</p> <ul style="list-style-type: none"> <li>• give you information about the processing</li> <li>• introduce simple ways for you to request human intervention or challenge a decision</li> <li>• carry out regular checks to make sure that our systems are working as intended</li> </ul>
Right to complain to the Information Commissioner's Office (ICO)	<p>The ICO are responsible for regulating data protection legislation in the UK To make a complaint visit <a href="http://ico.org.uk">ico.org.uk</a> or call 0303 123 1113</p>

#### How to contact us?

If you have any questions about this privacy policy, or you would like to exercise any of your rights, please contact our Data Protection Officer:

Data Protection Officer: Clinical DPO  
 Phone Number: 0203 411 2848  
 Email: [KellyEyeCareDPO@clinicaldpo.com](mailto:KellyEyeCareDPO@clinicaldpo.com)