Islington Osteopathy Clinic
Privacy Notice and Data Protection Complaints Procedure
Version 2.0 | June 2026

ISLINGTON OSTEOPATHY CLINIC

1 - Scope
This privacy notice (sometimes referred to as a privacy policy or privacy statement) concerns personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of UK data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and its storage within the UK.

1 – Islington Osteopathy Clinic, based at Colebrooke House, 10-12 Gaskin Street, London, N1 2RY, which hereafter for the purposes of this privacy notice will be referred to as the Osteopaths, is pleased to provide the following information:

2 - Who we are
The Osteopaths diagnose and treat musculoskeletal conditions. Treatments are carried out in accordance with the Institute of Osteopathy patient's charter. The practice may also provide other treatments, about which our staff would be pleased to provide more details.

3 - Personal Data
a) For the purposes of providing treatment Osteopaths may require detailed medical information. We will only collect what is relevant and necessary for your treatment. When you visit our practice, we will make notes which may include details concerning your health, medication, treatment and other issues affecting your musculoskeletal conditions. This data is always held securely, is not shared with anyone not involved in your treatment, although for data storage purposes it may be handled by pre-vetted staff who have all signed an integrity and confidentiality agreement. To be able to process your personal data it is a condition of any treatment that you give your explicit consent to allow Osteopaths to document and process your personal medical data. Contact details provided by you such as telephone numbers, email addresses, postal addresses may be used to remind you of future appointments, provide reports or other information concerning your treatment.

b) For marketing purposes, the Osteopaths may also use the contact details provided by you to respond to your enquiries including making telephone contact and emailing information to you which the practice believes may be of interest to you.

c) In making initial contact with the practice you consent to Osteopaths maintaining a marketing dialogue with you until you either opt out (which you can do at any time) or we decide to desist in promoting our services. Osteopaths may occasionally also act on behalf of its patients in the capacity of data processor, when we may promote other practitioners based at our premises, who may not be employed by us. Osteopaths do not broker your data and you can ask to be removed from our marketing database by emailing or phoning the practice using the contact details provided at the end of this privacy notice.

d) Some basic personal data may be collected about you from the marketing forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to, personally identifying information like Internet Protocol (IP) addresses.

e) Osteopaths' website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WordPress.org uses cookies to help Osteopaths to identify and track visitors and their website access preferences. Osteopaths' website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Osteopaths' website.

f) Osteopaths will only collect the information needed so that it can provide you with the services required.

4 - Legal basis for processing any personal data
To meet our contractual obligations obtained from explicit Patient Consent and legitimate interest to respond to enquiries concerning the services provided.

5 - Legitimate interests pursued by Osteopaths
To promote treatments for patients with all types of musculoskeletal problems including back pain and neck pain, tennis elbow, frozen shoulders, sciatica, headaches, sports injuries, and other degenerative conditions.

6 - Consent
Through agreeing to this privacy notice you are consenting to Osteopaths processing your personal data for the purposes outlined. You can withdraw consent at any time by using the postal, email address or telephone number provided at the end of this privacy notice.

7 - Disclosure
Osteopaths will keep your personal information safe and secure, only staff engaged in providing your treatment will have access to your patient records, although our administration team will have access to your contact details so that they can make appointments and manage your account. Osteopaths will not disclose your Personal Information unless compelled in order to meet legal obligations, regulations or valid governmental requests. The practice may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of its staff.

8 - Retention Policy
Osteopaths will process personal data during the duration of any treatment and will continue to store only the personal data needed for eight years after the contract has expired to meet any legal obligations. After eight years all personal data will be deleted, unless

basic information needs to be retained by us to meet our future obligations to you, such as erasure details. Records concerning minors who have received treatment will be retained until the child has reached the age of 25.

9 - Data storage
All Data is held in the United Kingdom.

10 - Your rights as a data subject
At any point whilst Osteopaths is in possession of, or processing your personal data, all data subjects have the following rights:

- Right to information - you can ask for information about what data is being processed and the rationale for such processing.
- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Osteopaths refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

At your request Osteopaths can confirm what information it holds about you and how it is processed.

11 - You can request the following information:
- Identity and the contact details of the person or organisation (Osteopaths) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Osteopaths and information about these interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

12 - To access what personal data is held, identification will be required
Osteopaths will accept the following forms of ID when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Osteopaths is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to islingtonosteopathyclinic@gmail.com or by phoning +44 (0)7881 525673 or writing to us at the address further below.

13 - Data Protection Complaints Procedure
Islington Osteopathy Clinic is committed to protecting your personal information and handling it fairly, lawfully and transparently. If you have any concerns about how your personal information has been collected, used, stored or shared, you have the right to make a complaint.

<u>How to make a complaint</u>
You may raise your concern by telephone, email or in writing using the contact details below. To help us investigate your complaint, please provide:
• Your name and contact details.
• A description of your concern.
• Relevant dates or appointments (where applicable).
• Copies of any supporting documents.
• The outcome you are seeking.
You may also make a complaint on behalf of another person where you have the legal authority to do so.

<u>How we will deal with your complaint</u>
Once we receive your complaint we will:
• receipt of your complaint as soon as reasonably practicable and normally within 5 working days.
• Investigate your concerns fairly, impartially and without unnecessary delay.
• Contact you if we require further information.

- Explain the outcome of our investigation and any action taken.
- Tell you about your right to refer the matter to the Information Commissioner's Office (ICO) if you remain dissatisfied.

If your complaint concerns your personal information, we will explain how your information has been processed and how your rights under UK data protection legislation have been considered.

Where appropriate, we will take reasonable steps to rectify any errors, improve our procedures and prevent similar issues occurring in the future.

Complaints relating to osteopathic treatment
If your complaint relates to the care or treatment you have received, we will investigate it in accordance with our complaints procedure. If you remain dissatisfied after we have responded, you may also contact the General Osteopathic Council (GOsC).

The details for each of these contacts are:
Karen Willis
Islington Osteopathy Clinic
Colebrooke House
10–12 Gaskin Street
London N1 2RY
Telephone +44 (0)7881 525673
Email: islingtonosteopathyclinic@gmail.com

Information Commissioner's Office (ICO)
Wycliffe House, Water Lane, Wilmslow, SK9 5AF
Telephone: 0303 123 1113
Website: https://ico.org.uk/make-a-complaint/

General Osteopathic Council (GOsC)
Osteopathy House
176 Tower Bridge Road
London SE1 3LU
Website: https://www.osteopathy.org.uk

We encourage you to raise your concerns with us first so that we have the opportunity to investigate and resolve them. However, you have the right to complain to the Information Commissioner's Office if you believe your personal information has been handled unlawfully or your data protection rights have been infringed.