

# Data Protection

## DATA PROTECTION PRIVACY NOTICE FOR STUDENTS

In providing your training we may receive information from other providers who have been involved in providing your education. This privacy notice describes the type of personal information we hold, why we hold it and what we do with it.

### ABOUT US

We are Orthodontic Team Training, operating at 21 Waterloo Place, Warwick Street, Leamington Spa, CV32 5LA.

Richard Cure is responsible for keeping secure the information about you that we hold. Those at the centre who have access to your information include orthodontic professionals involved with your tutoring, mentoring and assessment, and the administration team responsible for the management and administration of the practice.

Our data protection officer, Liz Hopkins, ensures that the centre complies with data protection requirements to ensure that we collect, use, store and dispose of your information responsibly. You can contact our data protection officer, Liz Hopkins by email at: [yourinformation@orthodonticteamtraining.com](mailto:yourinformation@orthodonticteamtraining.com) or by phone on 01926 881120

### INFORMATION THAT WE HOLD

We can only keep and use information for specific reasons set out in the law. If we want to keep and use information about your education, we can only do so in particular circumstances. Below, we describe the information we hold and why, and the lawful basis for collecting and using it.

#### Contact details

We hold personal information about you, including your name, address, telephone numbers, email address and GDC number (if applicable). This information allows us to fulfil our contract with you to provide training. We will also use the information to send you progress reports as we have a legitimate interest to ensure your training is met appropriately.

- Training Records
- We hold information about your training, including:
  - Practice Information
  - Application Details
  - Student Workbooks
  - Student Assessment Documents
  - Anonymised patient details
  - Notes of conversations with you about your training
  - Details of any complaints you have made and how these complaints were dealt with
  - Correspondence with you and other health professionals or institutions.

We collect and use this information to allow us to fulfil our contract with you to discuss your training options and provide education that meets your needs. We also use this information for the legitimate interest of ensuring the quality of the education we provide.

#### Financial information

We hold information about the fees we have charged, the amounts you have paid and some payment details. This information forms part of our contractual obligation to you to provide appropriate training and allows us to meet legal financial requirements.

## HOW WE USE YOUR INFORMATION

To provide you with the training and education that you need, we require up-to-date and accurate information about you. We will share your information with the education providers in connection with your training. We may contact you to conduct student surveys or to find out if you are happy with the training you received for quality control purposes.

We will seek your preference for how we contact you about your training. Our usual methods are telephone, email or letter.

If we wish to use your information for orthodontic research or orthodontic education, we will discuss this with you and seek your consent. Depending on the purpose and if possible, we will anonymise your information. If this is not possible we will inform you and discuss your options.

We may use your contact details to inform you of products and services available at our Centre.

If we wish to use your information for marketing, we will discuss this with you and seek your consent. Depending on the purpose and if possible, we will anonymise your information. If this is not possible we will inform you and discuss your options.

We have CCTV at the practice for the purposes of patient and staff safety. Please see our policy for CCTV for further details.

## SHARING INFORMATION

Your information is normally used only by those working at the practice but there may be instances where we need to share it – for example, with:

- Your Principal
- The hospital or community orthodontic services or other health professionals where you might carry out your training
- Other education providers, i.e. HEE

We will only disclose your information on a need-to-know basis and will limit any information that we share to the minimum necessary.

In certain circumstances or if required by law, we may need to disclose your information to a third party not connected with your training, including HMRC or other law enforcement or government agencies.

## KEEPING YOUR INFORMATION SAFE

We store your personal information securely on our practice computer system. Your information cannot be accessed by those who do not work at the practice; only those working at the practice have access to your information. They understand their legal responsibility to maintain confidentiality and follow practice procedures to ensure this.

We take precautions to ensure security of the practice premises, the practice filing systems and computers.

Our computer system has a secure audit trail and we back-up information routinely.

We use cloud computing facilities for storing some of your information. The practice has a rigorous agreement with our provider to ensure that we meet the obligations described in this policy and that we keep your information securely.

We keep your non-clinical records for 10 years after the date of completion of your training. At your request, we will delete non-essential information (for example some contact details) before the end of this period.

## ACCESS TO YOUR INFORMATION AND OTHER RIGHTS

You have a right to access the information that we hold about you and to receive a copy. We do not usually charge you for copies of your information; if we pass on a charge, we will explain the reasons.

### **You can also request us to**

- Correct any information that you believe is inaccurate or incomplete. If we have disclosed that information to a third party, we will let them know about the change.
- Erase some of the information we hold. For legal reasons, we may be unable to erase certain information (for example, information about the training provided). However, we can, if you ask us to, delete some contact details.
- Stop using your information – for example, sending you details or information about our services. Even if you have given us consent to send you marketing information, you may withdraw that consent at any time.
- Stop using information if you believe the information is inaccurate or you believe we are using your information illegally.
- Supply your information electronically to another education provider.

If we are relying on your consent to use your personal information for a particular purpose, you may withdraw your consent at any time and we will stop using your information for that purpose.

All requests should be made by email to our data protection officer at [yourinformation@orthodonticteamtraining.com](mailto:yourinformation@orthodonticteamtraining.com)

### **If you do not agree**

If you do not wish us to use your personal information as described, you should discuss the matter with us. If you object to the way that we collect and use your information, we may not be able to continue to provide your orthodontic care.

If you have any concerns about how we use your information and you do not feel able to discuss it with anyone at the practice, you should contact The Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (0303 123 1113 or 01625 545745).

Date: June 26th 2018

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