**Steps Physiotherapy and Sports Injury Clinics Privacy Policy**

**ABOUT US**

**We** Steps Physiotherapy and Sports Injury Clinics (also referred to as “we”, “us”, or “our”) are private physiotherapy practices in Sheffield, England.  **Our** addresses are 32 Southbourne Road, Sheffield S10 2QN and 14 Ox Hill, Halfway, Sheffield S20 4SX.

**THE PURPOSE OF THIS NOTICE**

This Notice is designed to help you understand what kind of information **we** collect in connection with **our** products and services and how **we** will process and use this information. In the course of providing you with products and services **we** will collect and process information that is commonly known as personal data.

**This Notice describes how we collect, use, share, retain and safeguard personal data.**

**This Notice sets out your individual rights; we explain these later in the Notice but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.**

**WHAT IS PERSONAL DATA?**

Personal data is information relating to an identified or identifiable natural person. Examples include an individual’s name, age, address, date of birth, gender and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to and not limited to, an individual’s health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic and biometric data, or data relating to sexual orientation.

**WHY DO WE NEED YOUR PERSONAL DATA?**

**We** will use your personal data for the performance of our contract with you, to provide physiotherapy products and services, to respond to any requests from you about services **we** provide, to improve our services to you and to process complaints. **We** will also use your personal data to manage your accounts and perform audits on the data **we** collect.

In consenting to **our** products and services you should understand that you are forming a contract with **us**. If you contact **us** to request details on the services **we** provide, **we** consider ourselves as having a legitimate business interest to provide you with further information about **our** products and services.  You may request to be withdrawn from all such marketing activities at any time.

In order to provide you with a personalised exercise programme, we share your name and email address with our exercise software provider, Physiotec. This service provider has access to your personal information only to provide you with an exercise programme on our behalf and are obligated not to disclose or use your data for any other purpose. If you require further information regarding their privacy policy, please visit their website directly.

In some situations, **we** may request your consent to share your data with other health professionals, such as a consultant or your GP. Where **we** require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting **our**Data Privacy Representative at stepsphysio@btinternet.com

**PERSONAL DATA WE COLLECT**

In order for **us**to provide and administer physiotherapy services for you, **we**will collect and process personal data about **you**. **We** will also collect your personal data where you request information about **our** services, promotions and products.

In most circumstances, you will provide **us** with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide **us** with personal data when completing online contact forms, when you contact **us** via the telephone, when writing to **us** directly or where **we**provide you with paper based forms for completion or we complete a form in conjunction with you.

**We** will not share your personal data with anyone else, unless previously agreed with you, and obtained a consent form signed by you.

Where **we** collect data directly from you, **we** are considered to be the controller of that data i.e. **we** are the data controller.

A data ‘controller’ means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data ‘processor’ means the individual or organisation which processes personal data on behalf of the controller.

As a provider of physiotherapy services, **we** will process the following categories of data:

* Personal data such as an individual’s name, address, date of birth, gender, contact details and details of your GP and medical insurance if applicable.
* Special categories of personal data such as current health and details on your past medical history, medications you may be taking and social history.
* If you object to the collection, sharing and use of your personal data **we** may be unable to provide you with **our** products and services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

**Computer browsing information – Log data:**

We do not store any of your browsing history when you are viewing our website. However, we may use third party services such as Google Analytics that collect, monitor and analyse this type of information in order to increase our responsiveness to your needs. For further information on these third-party providers privacy policy please visit their website directly.

**Marketing Opt-in:**

By providing your registration details via our website, you are agreeing to receive marketing emails related to our Services and/or Products. You will be able to opt-out of emails at any time. Should you have any issues please contact stepsphysio@btinternet.com

**Web based request forms:**

When you fill out the forms on our website (www.appihealthgroup.com), we store the data you send us. We may use this information to improve customer service and for marketing purposes. This data is NOT passed on to any third-party organisations and resides in secure web-based database.

**E-mail use Policy:**

Your email address will be added to our database and may be used for contacting you in regard to your sessions, your programs, marketing campaigns, offers and other generalised information. If you do not wish to receive any of this information you can unsubscribe at any time by emailing stepsphysio@btinternet.com requesting this.

If you require more information about **our**services or further details on how **we** collect personal data and with whom **we** share data with, please contact **our** Data Privacy Representative by e-mailing stepsphysio@btinternet.com

**In clinic forms:**

**When you visit any of our clinical centres you will fill out a standardised registration form. This form will collect the following details:**
Name
Address
Date of Birth
Telephone Number
Email address
GP details

Past Medical History
Private medical Insurance (PMI) details (if applicable)

The purpose of this information is to allow your clinician to ensure they manage your case with the relevant due care and consideration for your age, your requirements and your program. The PMI details are used to bill your insurer as appropriate or to communicate directly with them if appropriate. None of your information is passed to a third party unless under your explicit consent to release details.

Your PMI may ask for reports of your sessions but this will only occur with your consent.

You may request us to write a letter to a school, a consultant or another person of interest to you. In doing so we will use your name, DOB and relevant medical details on that letter. You will also receive a copy of the letter should you so choose.

**DATA RETENTION**

The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests for statistical analysis (profiling) and service development and marketing purposes.

We are required by law to hold patient notes for a minimum of 8 years.

Please contact **our** Data Privacy Representative at stepsphysio@btinternet.com if you object to the use of, or you have any questions relating to the use of your data or the retention of your personal data

You can opt out of receiving marketing services by e-mailing stepsphysio@btinternet.com

**YOUR RIGHTS**

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing.  Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

-       The **right to be informed** about the personal data being processed;

-       The **right of access** to your personal data;

-       The **right to object** to the processing of your personal data;

-       The **right to restrict** the processing of your personal data;

-       The **right to rectification**of your personal data;

-       The **right to erasure**of your personal data;

-       The **right to data portability** (to receive an electronic copy of your personal data);

-       Rights relating to automated decision making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law **we** will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, **we** are entitled to charge a reasonable administration fee.

In exercising your Individual Rights, you should understand that in some situations **we** may be unable to fully meet your request, for example if you make a request for **us** to delete all your personal data, **we** may be required to retain some data by law for regulatory and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

For more information regarding your data rights, contact the UK’s data protection supervisory authority, the Information Commissioner’s Office (ICO).  The ICO may be contacted via its website which is <https://ico.org.uk/>, by [live chat](https://ico.org.uk/global/contact-us/live-chat) or by calling their helpline on 0303 123 1113.

**Lawful disclosure:**

We will disclose your Personal Information where required to do so by law or in accordance with an order of a court of competent jurisdiction. We will also disclose your information if we believe that lawful disclosure is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

**PROTECTING YOUR DATA**

The protection of your personal information is vitally important to us. We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data. However, as no form of data transmission is 100% reliable we cannot guarantee its absolute security. Therefore we make no warranties as to the level of security afforded to your data. We will however always act in accordance with the relevant UK and EU legislation.

**DATA PRIVACY REPRESENTATIVE**

To ensure data privacy and protection has appropriate focus within our organisation we have a Data Privacy Representative.  The Data Privacy Representative is Clare Spafford, who may be contacted at: stepsphysio@btinternet.com

**Minors’ Privacy**

Protecting the privacy of minors is especially important. We do not knowingly collect Personal Data from persons under the age of 16 without obtaining parental consent. If we learn that Personal Data has been collected on the Service from persons under 16 years of age and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under 18 years of age has provided us with personal information, please contact us.

**Changes to Privacy Policy:**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

**Jurisdiction:**

This Policy shall be governed and construed in accordance with the laws of England and Wales, without regard to its conflict of law provisions.

**Further Information:**

If you have any further questions regarding our privacy policy please contact us directly.