



Web Privacy and Cookie Policy – GDPR Compliance

Status:	Internal and External
Contributes to:	Health and Social Care Act 2008 (Regulated Activities Regulations 2014, Data Protection Act

Policy Number		1
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Ratified by	Director, Data Protection Officer	
Ratified on	25th May 2018	
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Author/Contact for Information	Director	
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Distribution Method	email adn web	

Document Review / Change History

Date	Author	Reason For Changes	Comments
8th July 2019	EK	UPDATE TO POLICY	

Introduction

GDPR, Information, IP addresses and Cookies

Kann Foot Surgery Ltd is committed to protecting and respecting your privacy. We never sell personal data and we carry out all processing operations in strict compliance with the EU General Data Protection Regulation.

Please read the following carefully to understand our views and practices regarding your personal data and how Kann Foot Surgery Ltd will treat it.

For the purpose of the Data Protection Act 1998 (the Act), the data controller is Kann Foot Surgery Ltd, a limited company incorporated under the Companies Act with Company Registration No.(10314957) and having its registered office address at (Harlow Enterprise Hub Gf21, Edinburgh Way, Harlow, England, CM20 2NQ)

When you see us for a consultation

When you supply your personal details to this clinic they are stored and processed for 4 reasons

1. We need to collect personal information about your health in order to provide you with the best possible treatment. Your requesting treatment and our agreement to provide that care constitutes a contract. You can, of course, refuse to provide the information, but if you were to do that we would not be able to provide treatment.
2. We have a “Legitimate Interest” in collecting that information, because without it we couldn’t do our job effectively and safely.

3. We also think that it is important that we can contact you in order to confirm your appointments with us or to update you on matters related to your medical care. This again constitutes “Legitimate Interest”, but this time it is your legitimate interest.

4. Provided we have your consent, we may occasionally send you general health information in the form of articles, advice or newsletters. You may withdraw this consent at any time – just let us know by any convenient method.

We have a legal obligation to retain your records for 8 years after your most recent appointment (or age 25, if this is longer), but after this period you can ask us to delete your records if you wish. Otherwise, we will retain your records indefinitely in order that we can provide you with the best possible care should you need to see us at some future date.

Your records are stored

- electronically (“in the cloud”), using a specialist medical records service called Cliniko. This provider has given us their assurances that they are fully compliant with the General Data Protection Regulations. Access to this data is password protected, and the passwords are changed regularly.
- To read more on the security of clinical records please visit <https://www.cliniko.com/security>

We will never share your data with anyone who does not need access without your written consent. Only the following people/agencies will have routine access to your data:

- The medical records service, who store and process our files
 - Your practitioner(s) in order that they can provide you with treatment
 - Our reception staff, because they organise our practitioners’

diaries, and coordinate appointments and reminders (but they do not have access to your medical history or sensitive personal information)

- Other administrative staff, such as our bookkeeper. Again, administrative staff will not have access to your medical notes, just your essential contact details.
- Limited information will be used for billing/invoicing purposes through our employed system called Xero. To read more on Xero's security policy please visit <https://www.xero.com/uk/about/security/>

From time to time, we may have to employ consultants to perform tasks which might give them access to your personal data (but not your medical notes). We will ensure that they are fully aware that they must treat that information as confidential, and we will ensure that they sign a non-disclosure agreement.

You have the right to see what personal data of yours we hold, and you can also ask us to correct any factual errors. Provided the legal minimum period has elapsed, you can also ask us to erase your records.

We want you to be absolutely confident that we are treating your personal data responsibly, and that we are doing everything we can to make sure that the only people who can access that data have a genuine need to do so.

Of course, if you feel that we are mishandling your personal data in some way, you have the right to complain. Complaints need to be sent to what is referred to in the jargon as the "Data Controller". Here are the details you need for that:

Ewan Kannegieter
Director at
Kann Foot Surgery Ltd

www.kannfootsurgery.com

enquiries@kannfootsurgery.com

Harlow Enterprise Hub Gf21, Edinburgh Way, Harlow, England,
CM20 2NQ)

If you are not satisfied with our response, then you have the right to raise the matter with the Information Commissioner's Office.

Information we may collect from you when accessing www.kannfootsurgery.com

- If you contact us, we may keep a record of that correspondence. In particular, if you contact us to discuss seeking our advice and/or services, we will keep a record of the advice/service that you require, the circumstances giving rise to your contact, your contact details and a record of your enquiry
- If you download documents from our site(s), details of the documents that have been downloaded
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data and the resources that you access.

IP addresses

We may collect information about your computer, including where available your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns, and does not identify any individual and is processed via Google Analytics.

Cookies

Our website uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

How Kann Foot Surgery Limited store your personal data

The data that Kann Foot Surgery Limited collects from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing or processing. Kann Foot Surgery Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although Kann Foot Surgery Limited will do its best to protect your personal data, it cannot guarantee the security of your data transmitted to our site(s); any transmission is at your own risk. Once Kann Foot Surgery Limited has received your information, it will use strict procedures and security features to try to prevent unauthorised access.

Uses made of the information

Kann Foot Surgery Limited uses information held about you in the following ways:

- to contact you to discuss the advice and/or services that you may require;
- to provide you with relevant information about our activities or services we offer

- to ensure that content from our site(s) is presented in the most effective manner for you and for your computer; and
- to notify you about changes to our site(s) or the services that we offer

Your rights

- You have the right to ask Kann Foot Surgery Limited not to process your personal data. You can exercise your right to prevent such processing by contacting Kann Foot Surgery Limited.
- Our site(s) may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Cookie Policy

Information about our use of cookies

Cookies

A cookie is a small data file that certain web sites write to your hard drive when you visit them. The only personal information a cookie can obtain is information a user supplies him or herself. A cookie cannot read data from your hard disk or read cookie files created by other sites. Cookies, however, enhance our web site performance in several ways, including providing a secure way for us to verify your identity during your visit to our web site

and personalising your experience on our site, making it more convenient for you. This web site uses the following cookie types so that we can serve you better.

Functionality or strictly necessary cookies

These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) to provide an enhanced, more personal experience. For instance, remembering a choice such as not to be asked again to fill in a questionnaire or user poll, or fulfilling a request by the user such as submitting a comment. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. This site uses:

- - PHPSESSID: This cookie is automatically created via PHP when a session is in use on the site.
- - ASP.NET_SessionId – This is a session cookie and allows for the maintenance of the online journey.
- - SecureToken – a session cookie used for the secure maintenance of a signed-in customer.

Performance Cookies

These cookies collect anonymous information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages.

These cookies don't collect information that identifies a visitor.

All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works. Any data collected is limited to the website operator's use only, for managing the performance and design of the site.

These cookies can be third party cookies but the information must be for the exclusive use of the publisher of the website visited.

This site uses:

Google's cookies for analytics and for conversion tracking:

`__utma`

This cookie is typically written to the browser upon the first visit to our site from that web browser. If the cookie has been deleted by the browser operator, and the browser subsequently visits your site, a new `__utma` cookie is written with a different unique ID. This cookie is used to determine unique visitors to our site and it is updated with each page view. Additionally, this cookie is provided with a unique ID that Google Analytics uses to ensure both the validity and accessibility of the cookie as an extra security measure. This cookie expires 2 years from set/update.

`__utmb`

This cookie is used to establish and continue a user session on our site. When a user views a page on our site, the Google Analytics code attempts to update this cookie. If it does not find the cookie, a new one is written and a new session is established. Each time a user visits a different page on our site, this cookie is updated to expire in 30 minutes, thus continuing a single session for as long as user activity continues within 30-minute intervals. This cookie expires when a user pauses on a page on our site for longer than 30 minutes.

Google Conversion tracking

The conversion tracking cookie is set on your browser only when you click an ad delivered by Google where the advertiser has opted in to conversion tracking. These cookies expire within 30 days and do not contain information that can identify you personally. If this cookie has not yet expired when you visit certain pages of the advertiser's website, Google and the advertiser will be able to tell that you clicked the ad and proceeded to that page. Each advertiser gets a different cookie, so no cookie can be tracked across advertiser websites. If you want to disable conversion tracking cookies, you can set your browser to block cookies from the googleadservices.com domain.

Why do we need to use these cookies?

We use the information we obtain from cookies for the following:

- Website usage and Google analytics

Other third-party cookies and Targeting cookies

A cookie is classed as being first party if it is set by the site being visited. However, a third party cookie is issued by a different server to that of the domain being visited. It could be used to trigger a banner advert based on the visitor's viewing habits or for analytical purposes. For example, when visiting a page with content embedded from YouTube, Google or Facebook. These service providers may set their own cookies on your web browser. Such anonymous cookies may be set by that third party to track the success of their application or to customise their application to you.

Blocking and deleting cookies

Should you wish to do so, you can refuse cookies by disabling them in your web browser's settings. If this is done it is

important not to exclude the benign and useful session cookies. Choose an option that rejects all third-party cookies such as Do Not Track (DNT), which can be enabled in your browser. Please note that this may impact on the usability of ours and other websites.

Most browsers are defaulted to accept and maintain cookies and you can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it or not. Please consult the support documentation for your web browser, which can be found online, for more information.

Opt-Out

At any point a service user may request that their information is removed from the hospital database.

Any such request should be directed to the following e-mail address:

enquiries@kannfootsurgery.com

Contact

Questions, comments and requests regarding this privacy and cookie policy are welcomed and should be addressed to:

enquiries@kannfootsurgery.com