

# Privacy Policy

Physiobeats respects your privacy and is committed to protecting your personal data. This Privacy Policy explains what personal data we collect from you and how we use it.

### Important information and who we are

Physiobeats Ltd is a company registered in England under company number 07401433 collectively referred to as "we", "us" or "our" in this privacy policy). Our registered office is 112 Hollyhedge Road, West Bromwich, B71 3AH. We are registered with the Information Commissioner's Office under the reference ZA064016

## **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name: Mehul Amin

Email address: admin@physiobeats.co.uk , Phone no: 03301138787

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (<u>www.ico.org.uk</u>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

#### The data

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Personal Data:** includes first name, maiden name, last name, title, date of birth, gender, home address, email address and telephone numbers.

**Special Data**: Health Data which includes records of interactions throughout treatment, professional background, services accessed, health-related information, treatment notes and reports, feedback, treatment outcomes, complaints or incidents, and any other personal data gathered during the provision of services or business operations.

The data may be collected from various sources, including:

• In-person interactions (e.g., appointments or events)



- Telephone communication
- Correspondence (post, text, email, etc.)
- Website or online portals (e.g., contact forms, consent forms, feedback forms)
- CCTV footage (from the organization or building landlords)
- Digital services (e.g., online triage tools, health apps)
- Third parties, such as solicitors, doctors, previous healthcare providers, employers, or companies with your permission and a lawful basis to share your information.

Your data is used to provide services, including responding to queries, supporting treatment, decision-making by healthcare professionals, record-keeping, quality management, and billing. It is also used for marketing (with consent), handling complaints, compliance with legal obligations, and auditing services. Data may be processed based on contractual necessity, legal obligations, consent, legitimate interests, or vital interests. Special health data is processed for medical diagnosis, healthcare provision, or with consent. Automated decision-making tools use your data to recommend treatments, and profiling is used to improve services. Data is only used for its intended purpose, but can be processed without consent where required by law.

Your data may be shared with selected third parties in cases where you request it, it is necessary for providing services or fulfilling contracts, required by law, or due to changes in business ownership. Physiobeats may share your data with group members, third-party treatment providers, applications used for services, solicitors, insurers, NHS providers, auditors, law enforcement, public bodies, external service suppliers, and analytics providers. Consent will be sought when required by medical confidentiality duties. Sharing data under professional duties differs from consent under privacy laws, which will follow the specified legal bases for processing.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### **International transfers**

We do not transfer your personal data outside the European Economic Area (EEA).

## **Data security**

Physiobeats is committed to protecting and respecting your privacy. Any decision we make regarding data will have considered the 6 principles for processing personal data contained in Data Protection Legislation.

Data Protection Legislation means the Data Protection Act 2018 (DPA 2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union,



it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

The Information Commissioner's Office (ICO) is the UK supervisory authority for data protection issues. More information regarding processing principles, as well as information on our additional data protection obligations, can be found on the <u>ICO website</u>.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **Data retention**

Physiobeats has physical, electronic, and operational procedures in place to safeguard and secure the information we collect. These measures are updated as necessary and audited regularly.

The retention of your data depends on factors such as:

- The time needed to complete our contract with you
- Time limits for legal claims, complaints, or incidents
- Compliance with legal obligations under EU/UK law
- Retention periods recommended by regulators or professional bodies

As Physiobeats provides healthcare services, there is a legal requirement to keep records for a minimum period. Typically, data related to healthcare services will be kept for 10 years, after which it will be destroyed if no longer needed.

#### Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

#### You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully



exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

 $\cdot$  If you want us to establish the data's accuracy.

 $\cdot$  Where our use of the data is unlawful but you do not want us to erase it.

 $\cdot$  Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

• You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

#### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

#### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no



right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 31/01/2025. If we change our Privacy and Cookies Policy, we will update the changes on this website. We may also place notices on other pages of the website, so you check our current policy at any time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.