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**Ming Chen Clinic Client Privacy Policy**

 -- Updated 16th May 2018

At Ming Chen Clinic, we are committed to respect and protect our patients’ privacy.

We recognise the importance of protecting personal and confidential information and work hard to keep your information secure and put you in control. This privacy notice is meant to help you understand what information we collect, why we collect it, and how you can update, manage and delete your information. Our privacy policy takes effect on 25th May 2018.

**Who is the Data Controller?**

The Data Controller, responsible for keeping your information secure and confidential is: **Ming Chen Clinic**. The Practice is registered as a data controller under the Data Protection Act 1998. The registration number is **Z9314109** and can be viewed online in the public register at <http://ico.org.uk/what_we_cover/register_of_data_controllers>

**Our contact details are:**

Ming Chen Clinic

24 Bernard Street

Edinburgh

EH6 6PP

Tel: 0131 554 7888

Email: mingchenclinic@gmail.com

**Whose information does this privacy notice apply to?**

This privacy notice applies to information we collect from:

* Patients ( Current, prospective patients and former patients)
* Visitors to our website and Facebook, Twitter social media etc.

For job applicants and our current and former employees (See Staff Privacy Notice)

**What type of information is collected from you**

A health record (sometimes referred to as medical record) should contain all the clinical information about the care you received. Based on this information, our practitioners can make judgements about your care going forward.

The data in your records can include:

• Details about you, such as your name, date of birth, address, telephone, email address, GP contact details and emergency contact details etc.

• Consultation notes, which your practitioner takes during an appointment, detailed reports about your health and history,
• Details about your treatment and aftercare

• Information about allergies

• Your medications and any reactions to medications in the past
• Any known long-term conditions, such as diabetes or asthma

• Medical test results such as [blood tests](https://www.nhs.uk/conditions/blood-tests/pages/introduction.aspx), allergy tests and [other screenings](https://www.nhs.uk/Livewell/Screening/Pages/screening.aspx) [X-rays](https://www.nhs.uk/Conditions/X-ray/Pages/Introduction.aspx), photographs and image slides, such as [MRI scans](https://www.nhs.uk/conditions/mri-scan/Pages/Introduction.aspx) or [CT scans](https://www.nhs.uk/Conditions/ct-scan/Pages/Introduction.aspx)

• Any clinically relevant lifestyle information, such as smoking, alcohol or weight

**Why do we collect your information and How is your information used**

In Ming Chen Clinic, our practitioners who provide you with care maintain records about your health and any treatment or care you have received previously. To ensure you receive the best possible care, your records are used to facilitate the care you receive.

We may use your name, address, telephone number and email address to make and rearrange your appointments. We will not send any marketing materials to your emails. We will monitor any email we send or receive, including file attachments, for viruses or malicious software. Please be aware that we are not able to send or receive encrypted emails, therefore any emails may not be protected in transit.

Information may be used within the practice for clinical audit to monitor the quality of the service provided and tax purposes. We will always get our patients consent first before we refer our patients to other therapists within the practice or other healthcare professionals outside our practice.

Sometimes your information may be requested from third party such as an employer or insurance – the clinic will always gain your consent before releasing the information for this purpose.

We keep accident records for any patients, visitors or staff who are involved in accidents at our clinic in accordance with UK Health and Safety Legislation including the Reporting of Injuries, Diseases and dangerous Occurrences Regulations (RIDDOR)to comply with the law and to secure evidence in the event of complaint or an insurance claim.

**For people who use our website or social media**

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will make it clear when we collect personal information and will explain what we intend to do with it.

Our website search is powered by (Google Adword). Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific data is collected by us or any third party.

We use website cookies to improve user experience of our website by enabling our website to 'remember' users, either for the duration of their visit - using a 'session cookie' - or for repeat visits - using a 'persistent cookie'.

We use a third party service (Totalwebsolutions) to help maintain the security and performance of our website. To deliver this service it processes the IP addresses of visitors to our website.

We use a third party service, (www.totalwebsolutions.com), to host our website. This site is hosted at (totalwebsolutions). We use a standard (Google Analytics) to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. Ming Chen Clinic requires visitors that want to post a comment to enter a name and email address. For more information about how we processes data, please see our privacy notice on website.

**How do we store information**

Your health care records may be electronic, on paper or a mixture of both, and we use a combination of working practices and technology to ensure that your information is kept confidential and secure. Only a limited number of authorised staff has access to personal information. Our electronic client records are protected with password and non electronic records are locked in the filing cabinet.

**How long do we keep your record?**

We keep your personal data for no longer than reasonably necessary. We keep patient records for a period of 7 years in accordance with the British Acupuncture Code of Professional Conduct:

[https://www.acupuncture.org.uk/public-content/effective-practice/bacc-professional-codes.html](https://www.acupuncture.org.uk/public-content/effective-practice/bacc-professional-codes.html%22%20%5Ct%20%22https%3A//mail.google.com/mail/u/0/%22%20%5Cl%20%22inbox/_blank)

We usually go through our clients’ health records every 3 months and all records more than 7 years old would be shredded and destroyed.

**How do we maintain the confidentiality of your record?**

We are committed to protecting your privacy and will only use information collected lawfully in accordance with [Data Protection Act (1998)](https://www.gov.uk/data-protection/the-data-protection-act%22%20%5Co%20%22External%20website) [Human Rights Act (1998)](http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act%22%20%5Co%20%22External%20website)

General Data Protection Regulations (GDPR) – post 25th May 2018

There are strict laws and regulations to ensure your health records are kept confidential and can only be accessed by health professionals directly involved in your care. Every member of staff who works for our clinic has a legal obligation to keep information about you confidential.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances. You will be informed who your data will be shared with and in some cases asked for explicit consent for this to happen when this is required.

## Your rights and your personal data

Unless subject to an exemption under the GDPR, you have certain rights with respect to your personal data as set out below.

  ·  The right to request a copy of your personal data which we hold about you.

·  The right to request that we correct any personal data if it is found to be inaccurate or out of date.

·  The right to request your personal data is erased where it is no longer necessary for us to retain such data.

·  The right to withdraw your consent to the processing at any time. This right does not apply where we are processing information using a lawful purpose other than consent.

·  The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [This right only applies where the processing is based on consent or is necessary for the performance of a contract with you and in either case when we are processing the data by automated means].

· The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.

· The right to object to the processing of personal data, (where applicable) [This right only applies where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics].

·  The right to be informed if your data is lost. We shall also inform the Information Commissioner’s Office in accordance with the time limits in the GDPR.

· The right to lodge a complaint with the Information Commissioner’s Office.

For further details about these rights please see the Information Commissioner’s websiteat [https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/](https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/%22%20%5Ct%20%22https%3A//mail.google.com/mail/u/0/%22%20%5Cl%20%22inbox/_blank)

**How to access to your personal information**

You have a right under the Data Protection Act 1998 to request access to view or to obtain copies of what information the clinic holds about you and to have it amended should it be inaccurate. In order to request this, you need to do the following:

• Your request must be made in writing to the clinic. There may be a charge of £10 to have a printed copy of the information held about you.
• We aim to comply with requests for access to personal information as quickly as possible but will ensure that it is provided to you within 40 days of receipt of a request.
• You will need to give adequate information (for example full name, address, date of birth, and details of your request) so that your identity can be verified and your records located.

**Objections or Complaints**

Should you have any concerns about how your information is managed at Ming Chen Clinic, please contact the Practice Manager. If you are still unhappy following a review by the practice, you can then complain to the Information Commissioners Office (ICO) via their website (www.ico.gov.uk).

**Change of Details**

It is important that you tell our receptionist and our practitioner who is treating you if any of your details such as your name or address have changed or if any of your details such as date of birth is incorrect in order for this to be amended. You have a responsibility to inform us of any changes so our records are accurate and up to date for you.

Any changes to this notice will be published on our website and on the Practice notice board.