

Helix House Privacy Policy Table 1	Personal data			Personal and special data	Special category data	
Data Subjects (That's you!)	Subscribers to our Newsletter mailing list	Patients who are treated at Helix House	Public Eg enquiries	Helix House employees, practitioners, contractors	Patients who are treated at Helix House	General Public eg enquiries containing health information
Data source	Opt-in subscription by data subject	Directly given by data subject	Directly given by data subject	Directly given by data subject	Directly given by data subject. Notes taken by your Osteopath	Directly given by data subject
Data collected	Name Email	Title Name Date of Birth Address Email Phone numbers Gender Accounting data Call records of phone calls Email and SMS correspondence with you relating to the provision of healthcare	Name Address Email Phone numbers Call records of phone calls Email and SMS correspondence with you	Name Address Email Phone numbers HR information eg NI, CV Bank details Call records of phone calls Email and SMS correspondence with you relating to a contract	Osteopathic patient records Call records of phone calls Email and SMS correspondence with you relating to the provision of healthcare	Health information as part of a general enquiry Call records of phone calls Email and SMS correspondence with you relating to the enquiry
Purpose and legal basis for processing	Sharing educational health information and clinic news <i>Consent</i> <i>GDPR Article 6.1(a)</i>	Administrative purposes Appointments Payment and accounts <i>Contract</i> <i>GDPR Article 6.1(b)</i>	Administrative purposes <i>Contract</i> <i>GDPR Article 6.1(b)</i>	HR purposes Payments Contractual administration <i>Contract</i> <i>GDPR Article 6.1(b)</i> <i>Employment Obligation</i> <i>GDPR Article 9.2(b)</i>	Clinical records made as obliged by the regulatory body (GOSC), <i>Legal Obligation</i> <i>GDPR Article 6.1(c)</i> and furthermore in order to provide you with healthcare <i>Provision of healthcare</i> <i>GDPR Article 9.2(h)</i> To function as a legal record <i>Legal claims</i> <i>GDPR Article 9.2(f)</i> For emergency situations <i>Vital Interests</i> <i>GDPR Article 6.1(d)</i> <i>Vital interests of incapacitated person</i> <i>GDPR Article 9.2(c)</i>	To determine if treatment offered at Helix House might be suitable <i>Contract</i> <i>GDPR Article 6.1(b)</i> <i>Provision of healthcare</i> <i>GDPR Article 9.2(h)</i>

					And If obliged to inform the local authorities of a public health risk <i>Public task</i> <i>GDPR Article 6.1(e)</i> <i>Public health</i> <i>GDPR Article 9.2(i)</i>	
Data processors	Helix House employees Content Management System (CMS)provider	Helix House employees Helix House practitioners Remote reception service Accountant Telecoms provider Email provider	Helix House staff Remote reception service Email provider Telecoms provider	Helix House Directors Helix House employees Accountant Email provider Telecoms provider	Helix House practitioners Helix House employees Email provider Telecoms provider	Helix House practitioners Helix House employees Email provider Telecoms provider
Accounting data	n/a	Payments processed by secure PDQ machine Paper merchant copy transaction slips archived	n/a	Bank details for payments	n/a	n/a
Data types	Digital data	Digital data Paper records	Digital data Paper records	Digital data Paper records	Digital data Paper records	Digital data Paper records
Retention method and Security	CMS mailing list Password protected Computer filing system	Password protected clinic software Lockable cabinets Password protected Computer filing system GDPR compliant email service	GDPR compliant email service Password protected Computer filing system	GDPR compliant email service Password protected Computer filing system Restricted access cabinets and archive storage	Lockable cabinets and archive storage Password protected Computer filing system GDPR compliant email service	GDPR compliant email service Password protected Computer filing system
Retention period	Until data subject unsubscribes	A minimum of 8 years after treatment has ended – adults Until aged 25 - children	Until request for erasure	Until request for erasure	A minimum of 8 years after treatment has ended - adults Until aged 25 - children	Until request for erasure
Erasure	Unsubscribe	Exempt from right to erasure under GDPR Article 17.3 (b), (c) and (e) For legal obligation see also GOsC (May 2005) clauses 116/117	By request	By request subsequent to fulfilment of contract and necessary processing requirement for administrative and legal obligations	Exempt from right to erasure under GDPR Article 17.3 (b), (c) and (e) For legal obligation see also GOsC (May 2005) clauses 116/117	By request
Destruction	Digital data – software deletion Paper records - shredding	Digital data – software deletion Paper records - shredding	Digital data – software deletion Paper records - shredding	Digital data – software deletion Paper records - shredding	Digital data – software deletion Paper records - shredding	Digital data – software deletion Paper records - shredding

Notes

1. "Article" means article of REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (General Data Protection Regulation)
2. GOsC is the General Osteopathic Council, the UK regulatory body for Osteopathy
3. For each data subject, the data in the Clinical records can be categorised into two components:
 - a. personal (non-special category) data component- including your name and contact details (address, phone number, email),
 - b. special category data component - including medical history and records of treatment