

Great Gait privacy notice

At Great Gait LTD we are committed to protecting and respecting your privacy. Great Gait Ltd personnel are aware that the law is changing to the General Data Protection Regulations (GDPR) in 2018.

This document details the information that Great Gait holds, the legal basis for processing personal data, how it can be accessed and how it is kept secure.

Information Great Gait holds:

What kind of data do we keep

Great Gait holds assessment information that is relevant to the outcome of the appointment with the client. This personal data includes name, address, GP information, next of kin, date of birth, history of procedures or underlying conditions that may be relevant to your treatment. This information comes directly from the client or from the referrer. This information is not shared with any third party unless in the event of disclosure which highlights risk to the patient or others.

Great Gait do not request or store clients financial details (e.g. bank account/credit card details)

We do not hold financial information of our clients. As a client you will be instructed to pay following receipt of an invoice. This payment will only ever be made to Great Gait LTD

We may process the following categories of personal data about you:

- Communication data – this includes any communication that you send to us including whether that be through the self-referral form, email, text, social media messaging, insurance company referrals, social media posting or any other communication that you send to us. We process this data for the purposes of communicating with you, for record keeping and for the pursuance or defence of legal claims. Our lawful grounds for this processing this information is our legitimate interests which in this vase are to reply to communications sent to us, keep records and to establish, pursue or defend legal claims
- Customer data – this includes data relating to any purchases of Orthotic goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful grounds. For processing is the performance on a contract between you and us and/or taking steps at your request to enter into such a contract
- Special category data – we do collect special category data as per GDPR article section 9 relating to explicit consent in Healthcare. Prior to treatment explicit consent will be signed and bound with terms & conditions of the service. This may include state of health, existing conditions, family or personal history in relation to those conditions. We will always be clear to explain when and why we need this information and the purpose for which we use it and will obtain explicit consent to use sensitive information.

How do we collect your personal data

We may collect your data by you providing data directly to us (for example filling in forms on our site or by sending us emails) We receive data from case management companies to use our services if you are under a case managed service. We share information with manufacturers of orthotics. However, in this case your data is anonymised.

All data will be held under HCPC, BAPO and ICO guidelines.

Data Security

We have put in place security measures to prevent your data being accidentally lost, used, altered, disclosed or accessed without authorisation. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to do so.

Social Media and Great Gait website

You may be asked for written consent to allow Great Gait to use pictures of orthotic products that have been supplied to you or gait analysis videos of you on the Great Gait social media account. Any photographs or videos that are used will only show from the neck downwards. All videos/images will be shown to the client before consent is given. Consent forms will be signed if you are willing to allow use of these pictures or videos on social media platforms or on the Great Gait website. Should you agree to consent and change your mind you can ask for these photographs or videos to be taken off at anytime

The legal basis

Under article 6 (b) of the GDPR the legal basis for Great Gait processing data is that it is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Medical data is defined as a special category under article 9 of GDPR. The law allows special category data to be processed where explicit consent has been given. Great Gait terms and conditions form requires written consent prior to treatment. It is important that medical data is recorded so that treatment is relevant to the individual and so that progress can be monitored. Gait analysis may be recorded during your assessment if your consent is given. These may be used for educational purposes and to monitor progress.

Data retention

Great Gait will keep data for the same period as per guidelines from, health departments in England. These are:

- Adult data will be kept 8 years after treatment is ceased or death
- Data for children and young will be kept until 25th birthday or age 26 if the young person was 17 at conclusion of treatment, or 8 years after death

Great Gait is legally obliged to maintain data as per private healthcare insurance policy

Contact from Great Gait

Great Gait has a single point of contact procedure. This means that only a named contact from Great Gait will ever contact you. For reference your nominated contact is Conor McDaid. The contact details for Conor McDaid are on the company website.

Your legal rights

Under data protection laws you have the rights in relation to your personal data that include the right to request access, correction, erasure restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You will not have to pay a fee to access you personal data. However if the request is clearly unfounded, repetitive or excessive then we may charge a reasonable fee

Great Gait uses personal data to act on your behalf. The way in which this is done is set out in the terms and conditions of service