



CAMBRIDGE ACADEMY OF DENTAL IMPLANTOLOGY

Privacy Notice

The Cambridge Academy of Dental Implantology is owned and operated by Dental Seminars Ltd (Company registered in England & Wales. Company number 05475059)

We aim to meet the requirements of the Data Protection Act 2018, the General Data Protection Regulation (GDPR), the guidelines on the Information Commissioner's website as well as our professional guidelines and requirements.

The data controller is Dr Stuart Ellis, who is also the Information Governance Lead.

This Privacy Notice is available on the practice website at CAofDI.com, by email if you contact info@CAofDI.com by calling 01223 467000.

Delegates and students will be asked to provide personal information when enrolling on a course. The purpose of us processing this data is to provide our services.

Tutors, examiners and mentors will be asked to provide personal information when taking up a position. This data is used for the purpose of course management and for communication regarding courses and delegates/students.

Patients will be asked to provide personal information when undergoing treatment or assessment for treatment as part of our courses. The purpose of us processing this data is to provide optimum health care to the patients and for the training of dentists.

The categories of data we process are:

- Personal data for the purposes of staff and self-employed team member management
- Personal data for the purposes of direct mail, email and/or text marketing
- Special category data including health records for the purposes of the delivery of health care
- Special category data including health records and details of criminal record checks for managing employees and contracted team members

We never pass personal details to a third party unless we have a contract with them to process data on our behalf and will otherwise keep it confidential. If we intend to refer a patient to another practitioner or to secondary care such as a hospital we will gain the individual's permission **before** the referral is made and the personal data is shared.

- Personal data is stored in the EU in digital and hard copy format
- Personal data is stored in the US in digital format when the data storage company is certified with the EU-US Privacy Shield
- Personal data is obtained when a patient undergoes treatment or an assessment for treatment, and when a patient or delegate/student subscribes to an email list.

The lawful basis for processing special category data such as patients' and employees' health data is:

- *Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional*

The lawful basis of processing personal data such as name, address, email or phone number is:

- Consent of the data subject
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract

The retention period for special data in patient records is a minimum of 10 years and may be longer for complex records in order to meet our legal requirements. The retention period for staff records is 6 years. The retention periods for other personal data is 2 years after it was last processed.

Data subjects have the following personal data rights:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (clinical records must be retained for a certain time period)
- The right to restrict processing
- The right to data portability
- The right to object

Further details of these rights can be seen at the [Information Commissioner's website](#). Here are some practical examples of a data subject's rights:

- If a data subject is a patient being treated as part of a course they have the right to withdraw consent for important notifications, newsletters, surveys or marketing. They can inform us to correct errors in their personal details or withdraw consent from communication methods such as telephone, email or text. They have the right to obtain a free copy of their records within one month.
- If a data subject is **not** a patient being treated as part of a course they have the right to withdraw consent for processing personal data, to have a free copy of it within one month, to correct errors in it or to ask us to delete it. They can also withdraw consent from communication methods such as telephone, email or text.

We have carried out a Privacy Impact Assessment. A copy of this can be requested from the details below. The details of how we ensure security of personal data is in our Security Risk Assessment and Information Governance Procedures.

Comments, suggestions and complaints

Please contact Dr Stuart Ellis for a comment, suggestion or a complaint about your data processing at info@CAofDI.com, by calling 01223 467000, by writing to us or visiting the business premises at cavendish House, 183 Arbury Road, Cambridge, CB4 2JJ. We take complaints very seriously.

If you are unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO). Their telephone number is 0303 123 1113, you can also [chat online with an advisor](#). The ICO can investigate your claim and take action against anyone who's misused personal data. You can also visit their website for information on [how to make a data protection complaint](#).

Related practice procedures

You can also use these contact details to request copies of the following practice policies or procedures:

- Data Protection and Information Security Policy, Consent Policy
- Privacy Impact Assessment, Information Governance Procedures